TSD File Inventory Index

Date: <u>Agril 18, 2006</u>
Initial: <u>Muserod</u>

Facility Name: Lumbi de Sal	wer	tris, Inc. (by Felder Lite)	
Facility Identification Number: $\bot \mathcal{D}$	005	104 443	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	V	.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	1	C.1 Compliance - (Inspection Reports)	V
.3 Part A Application and Amendments		C.2 Compliance/Enforcement	T _V
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports	V	C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring	V	D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc	,	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Teport 5. RFI QAPP	
•			1

Tetal -1

.6 RFI QAPP Correspondence	.8 Progress Reports
.7 Lab Data, Soil-Sampling/Groundwater	D.5 Corrective Action/Enforcement
.8 RFI Progress Reports	.1 Administrative Record 3008(h) Order
.9 Interim Measures Correspondence	.2 Other Non-AR Documents
.10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study	.1 Forms/Checklists
1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
.2 Interim Measures	.1 Correspondence
.3 CMS Workplan	.2 Reports
.4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
.5 Stabilization	G.1 Risk Assessment
.6 CMS Progress Reports	.1 Human/Ecological Assessment
.7 Lab Data, Soil-Sampling/Groundwater	.2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation	.3 Enforcement Confidential
1 CMI Correspondence	.4 Ecological - Administrative Record
.2 CMI Workplan	.5 Permitting
.3 CMI Program Reports and Oversight	.6 Corrective Action Remediation Study
.4 CMl Draft/Final Reports	.7 Corrective Action/Remediation Implementation
.5 CMI QAPP	.8 Endangered Species Act
.6 CMI QAPP Correspondence	.9 Environmental Justice
1 Las Data - Loie Sampling / Kercandwille	

Note: Transmittal Letter to Be Included with Reports. Comments:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RECEIVED WMD RECORD CENTER

JUN 11 1996

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

May 31, 1996

RIVERSIDE INDUSTRIES, INCORPORATED ATTN: MICHAEL D. RASMUSSEN 13601 SOUTH ASHLAND RIVERDALE, IL

RE: US	EPA'ID N	umber ILD 005 10	04 443		
	ocation:		TH ASHLAND	AVE	
		RIVERDALE	, IL		
In respo	onse to yo	ur correspondence of	04/18/96		the following
informat	cion has b	een updated:			
AME OF T	MCMATTAM	TON•	RTVERDALE	INDUSTRIES.	. TNC

NAME OF INSTALLATION:

RIVERDALE INDUSTRIES, INC

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator

Waste Management Division

Abara Kiddo

cc: State Agency

File



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER		* ILD005104443 REAC	KNOWLE	DGEMENT
	•	HANDSCHY INDUSTRIES IN 13601 SOUTH ASHLAND AV RIVERDALE	E IL	60627
INSTALLATION ADDRESS		13601 SOUTH ASHLAND AV	egiv. petit perios perios perios	60627
EPA Form 8700-128 (4-80)	THE RESIDENCE OF THE PERSON OF	09/28/81		

Shirmone.	1. C	3. -	FO	R) }	ici	AL.	US	E (MI	.¥		
<u>•</u> 7	Z	2	0	0	5	1	O	ij	4	14	13	T [4	1
2	THE STATE OF THE S		625225310		SSIZUEN E	in the same	20-2700	THE REAL PROPERTY.	HOLDER	2000	13	1.4	15

IX. DESCRIPTION OF HAZ	ZARDOUS WAST	ES (continued from fi	ont)		
A. HAZARDOUS WASTES FRO waste from non—specific sou	OM NON—SPECIFIC rees your installation	SOURCES. Enter the for handles. Use additional	our—digit number from sheets if necessary.	40 CFR Part 261.31 fo	r each listed hazardou
	2	3	4	5	6
7 7	23 - 26 8	9	23 - 26 10	23 - 25 11	23 - 26 12
23 - 26	23 - 26	23 - 25	23 - 26	23 - 26	23 - 26
B. HAZARDOUS WASTES FRO specific industrial sources you	OM SPECIFIC SOUR or installation handle:	CES. Enter the four—dig s. Use additional sheets i	it number from 40 CF f necessary.	R Part 261.32 for each I	isted hazardous waste from
13	14	15	16	17	18
<u>K1078</u>	K079	<u>K</u> 4 08 0	<u>K085</u>	23 ~ 26	23 - 26
10	20	21	22		24
23 - 26	23 - 26	23 - 25	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
C. COMMERCIAL CHEMICAL stance your installation handle	PRODUCT HAZARI	23 - 26 DOUS WASTES, Enter t grandous waster Use add	ne four—digit number if tional sheets if necessar	123 - 26 From 40 CFR Part 261.3	3 for each chemical sub-
31	32	33	34	35	36
जिल्ला ज	011910	<u>जिन्न</u>	111/15	POST TOTAL	
23 - 26	23 - 25	23 - 26	23 - 26	<u>VII.617</u>	23 - 26
37	38	39	40	\$1	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	23 - 26 48
D. LISTED INFECTIOUS WAST	23 - 26	23 - 28	[23	23 - 26	23 - 26
hospitals, medical and researc	h laboratories your i	nstallation handles. Use	edditional sheets if nec	n nsted nazardous waste essary.	rrom nospitals, veterinary
49	50	51	52	53	54
E. CHARACTERISTICS OF NO hazardous wastes your installa	zszs_ N-LISTED HAZAR ation handles. <i>(See 4</i>)			23 - 26 sponding to the characte	ristics of non—listed
☐1. IGNITABLE	_	ls, connosive	□3. REAC	TIVE	□ 4. TOXIC
(1000)	(00)	02)	(D003)		(5000)
X. CERTIFICATION					
I certify under penalty of attached documents, and t I believe that the submitted mitting false information, is	hat based on my d information is t	inquiry of those indit rue, accurate, and co	iduals immediately nplete. I am aware	responsible for obta	ining the information. To
SIGNATURE	\sim \wedge	NAME & OFFIC	IAL TITLE (type or p	rint)	DATE SIGNED
Millian		DTVICT	он МЯЛ	AGEIL	AUG. 20,1980
EPA Form 8700-12 (6-80) REV	ERSE				



Mr. Jim Pierce Manager Bureau of Land Illinois Environmental Protection Agency P.O. Box 19276 Springfield, IL 62794-9276

RE: GENERATOR ID # ILD 031258A

APR 2 5 1996

RECEIVED WMD RECORD CENTER JUN 11 1996

or production when i

Dear Mr. Sutton:

Please be informed that the name of this facility has been changed:

From: Handschy Industries, Inc.

Riverdale Industries, Inc.

This facility will now use the name "Riverdale Industries, Inc." for regulatory compliance purposes. Please note this change for IEPA records as necessary.

This name change was made for internal business reasons. All other aspects of the business remain the same.

Should you have any questions regarding this letter, please call the undersigned at (708) 597-7990.

Michael D. Rasmussen

Name

General Manager Riverdale Industries

RM/kb

cc:

G. Graham

J. Raevouri

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

Printed on recycled paper



invironmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

217/782-9882

October 1, 1982

Application Received: 07/06/82 Permit Number 821401-03160005

Permit Issued To:

Land and Lakes Co.

P.O. Box 778

Park Ridge, II. 60068

Waste Stream Number 821401 Permit Expires: 09/08/85

Land and Lakes Co.

P.O. Box 778

Park Ridge, Il. 60068

Waste Name: Oil, Water & Waste Pigments (Ex CONCRETE LAGOON)

Waste Classification: Non-Hazardous Not Subject to Fee

Permit to receive the indicated waste is granted.

This permit is granted subject to the attached standard conditions.

Disposal Site: Chicago/Land and Lakes #1

IEPA Site No.: 03160005

IEPA Generator No.:

0312580001

Annual Volume Authorized: 156,000 Gallons

Disposition of Waste:

Bulk Waste (Solid, Liquid, Powder, or Sludge) Mixed with Daily Receipt of Refuse above Grade (Codisposal)

Attention: Frank Butler

Marks Comment that Ducker

Waste Generator: Hadnschy Chemical Co. 13601 S. Ashland

Riverdale, Il. 60627

Thomas E. Cavanagh, Jr. Manager, Permit Section

Division of Land Pollution Control

TEC:KEM:ejs:mad/47

cc: Handschy Chemical Co.

Region: Northern

825-5000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V.

111 West Jackson Blvd. CKICAGO, ILLINOIS 60604

DEC 0 8 1562

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Jack McMahon, President Handschy Industries Incorporated 13601 S. Ashland Avenue Riverdale, Illinois 60627

RE: Withdrawal of Part A (Recycling)

FACILITY NAME: Handschy Industries Incorporated

USEPA ID NO.: - ILD 005 104 443

Dear Mr. McMahon:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of October 28, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility uses, re-uses, recycles, or reclaims its waste as described in 40 CFR Part 261.6. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Pesource Conservation and Recovery Act at this time. Please be advised that you must still comply with all applicable State and local requirements.

You will retain your USFPA Identification number if you notified as a generator or transporter of a hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Recycling)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Maste Management Branch

cc: Frank Butler, Superintendent

William Spori, General Manager

I EPA



13601 SO. ASHLAND AVENUE • RIVERDALE, ILLINOIS 60627

(312) 468-4900

October 28, 1982

US Environmental Protection Agency, Region V 111 West Jackson Boulevard Chicago, Illinois

Attention: Karl J. Klepitsch, Chief Waste Management Section

Part A Application (Paint Waste) Subject:

Facility Name: Handschy Industries, Inc. US EPA ID No: ILD-005-104-443 6, T > 0, UI, PA

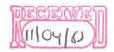
Gentlemen:

This is in answer to your subject letter of 25 June, 1982, and Further to our subject letter of August 24, 1982, requesting extension of 60 days time in order to allow us time to follow up your suggestion that we review our wastes covered in our Part A Hazardous Waste Permit Application on the possibility, as your review indicated, that our facility may not require a permit in the light of information you provided in your letter that Hazardous Waste No.'s K078, K079, KO81 and KO82 (also mentioned were FO17 & FO18 - these do apply to our operations) have been temporarily suspended from regulation. However, the above wastes remain subject to regulation (i.e. requirement for permit) where such wastes exhibit the specific characteristics of ignitability (261.21), corrosivity (261.22), reactivity (261.23), or EP toxicity (261.24) as defined in Part 261 Subpart C, or, if listed in Part 261 Subpart D.

We have re-examined our wastes (listed below) pursuant to Part 262.11 and our findings follow.

Our wastes as listed in our subject application (US EPA ID No: ILD-005-104-443, Hazardous Waste Permit Application - US EPA Form 3, page 3 of 5, and also as shown diagramatically in process diagram under item III, page 2 of 5, are:

- 1. K-078 solvent cleaning, etc., waste. This waste a mixture of several common industrial solvents - has a flash below 140°F P.M.C.C. and, therefore, exhibits the characteristics of ignitability. However, this waste is: (1) not stored for 90 days and (2) is hauled away by a reclaimer on a regular basis to reclaim the waste solvent as a re-usable commercial commodity. Accordingly, we claim exemption from regulation for this waste under Subpart A, paragraph 261.6 (a)(1).
- K-079 Water cleaning waste from paint manufacturing
- K-080 Caustic cleaning (floor) from paint manufacturing
- 4. K-082 Air pollution control sludges (from wet scrubbers) from paint manufacturing.





13601 SO. ASHLAND AVENUE • RIVERDALE. ILLINOIS 60627 • PHONE: (312) 597-799

(312) 468-4900

We want to bring your particular attention to the fact that K-079, K-080 and K-082 were treated as individual waste streams with reference to our manufacturing operations and were so listed in our subject application. This was done to identify our individual internal waste generation sources. However, these three waste streams are actually collected in a concrete lagoon (see process diagram on page 2 of 5, US EPA Form 3, of our Part A Hazardous Waste Permit Application) which results in a commingled single waste stream for purposes of disposal. We did not assign a US EPA Hazardous Waste Number to the combined waste because we did not consider it pertinent at the time to the purposes of the subject permit application.

This combined waste is permitted by the IEPA for disposal under IEPA Waste Stream Number 821401 (i.e. K-079+K-080+K082) by Chicago/Land and Lakes Co., Park Ridge, Illinois, in their disposal sites Nos. 03160005 (Site #1), 03160028 (Site #2), and 03160034 (Site #3). Copies of IEPA permits for disposal of Waste Stream No. 821401 in any one of the above 3 permitted alternate disposal sites are attached for your information.

Please note from these attached permits that on the basis of analytical data and other information supplied to the Illinois EPA on the combined waste stream - No. 821401 - as required by the application for IEPA Waste Disposal Permit, that our combined waste stream is classified by the IEPA as "NON-HAZARDOUS". On the basis of this classification, we consider the combined waste as not being subject to regulation as a hazardous waste.

In sum, in re-examination of our wastes K-078 and combined waste (K-079 + K-080 + K-082), we conclude on the strength of the explanations given above pertinent to each waste that our wastes are exempt from regulations and, accordingly, we request withdrawal of our subject Part A Application for Hazardous Waste Permit on file with your office.

I certify under penalty law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Attachments: copy each of

IEPA permits for waste disposal for Waste Stream Number 821401 in Chicago/Land and Lakes Co. alternate disposal sites: #1 - IEPA Site No. 03160005; Site #2 - IEPA Site No. 03160028; and Site #3 - IEPA Site No. 03160034.

Very truly yours,

Jack McMahon

President

Handschy Industries, Inc.



13601 SO. ASHLAND AVENUE • RIVERDALE. ILLINOIS 60627

PHONE: (312) 597-7990 (312) 468-4900

AUG. 24, 1982

KARL J. KLEPITSCH, JR., CHIEF UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V 111 WEST JACKSON BLVD. CHICAGO, ILLINOIS 60604

> RE: PART A APPLICATEION (PAINT WASTE) FACILITY NAME: HANDSCHY INDUSTRIES, INC.

USEPA ID NO.: ILD-005-104-443 6,75001, PA

DEAR MR. KLEPITSCH,

IN RESPONSE TO YOUR LETTER DATED JUNE 25, 1982, REGUARDING A POSSIBLE REVISION OF OUR PART A APPLICATION, WE RESPECTFULLY REQUEST PERMISSION FOR AN EXTENSION OF 60 DAYS. THE TEMPORARY SUSPENSION OF THE SPECIFIC WASTES WOULD SEEM TO ELIMINATE THE NEED FOR A PERMIT BUT WE FEEL WE NEED THIS AD-DITIONAL TIME TO COMPLETELY AND CORRECTLEY EVALUATE OUR POSSIBLE EXEMPT STATUS. HANDSCHY INDUSTRIES HAS ALWAYS BEEN IN STRICT COMPLIANCE WITH ALL LOCAL, STATE, AND FEDERAL REGULATIONS, AND IT IS WITH THIS THOUGHT THAT WE ASK YOU GRANT OUR REQUEST. IF THERE ARE ANY QUESTIONS CONCERNING THIS MATTER PLEASE FEEL FREE TO CONTACT ME.

FRANK BUTLER

PLANT SUPERINTENDENT

word B. they

AUG 25 1982

WASTE MARGEMENT BRANCH EFA. REGION V





13601 SO. ASHLAND AVENUE • RIVERDALE. ILLINOIS 60627 •

(312) 468-4900

g, TSD, UI, PA

June 16, 1982

Mr. Robert Stone U.S.E.P.A. 111 W. Jackson Chicago, Ill. 60604

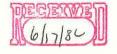
Dear Mr. Stone,

I am writing this letter to request withdrawal of our permit for storage of hazardous wastes. Our waste stream, K078, is currently being removed and recycled within the specified 90 day period. My facility I.D. number is ILD-005104443000If there are any questions concerning this please feel free to call.

Frank Butler Plant Superintendant

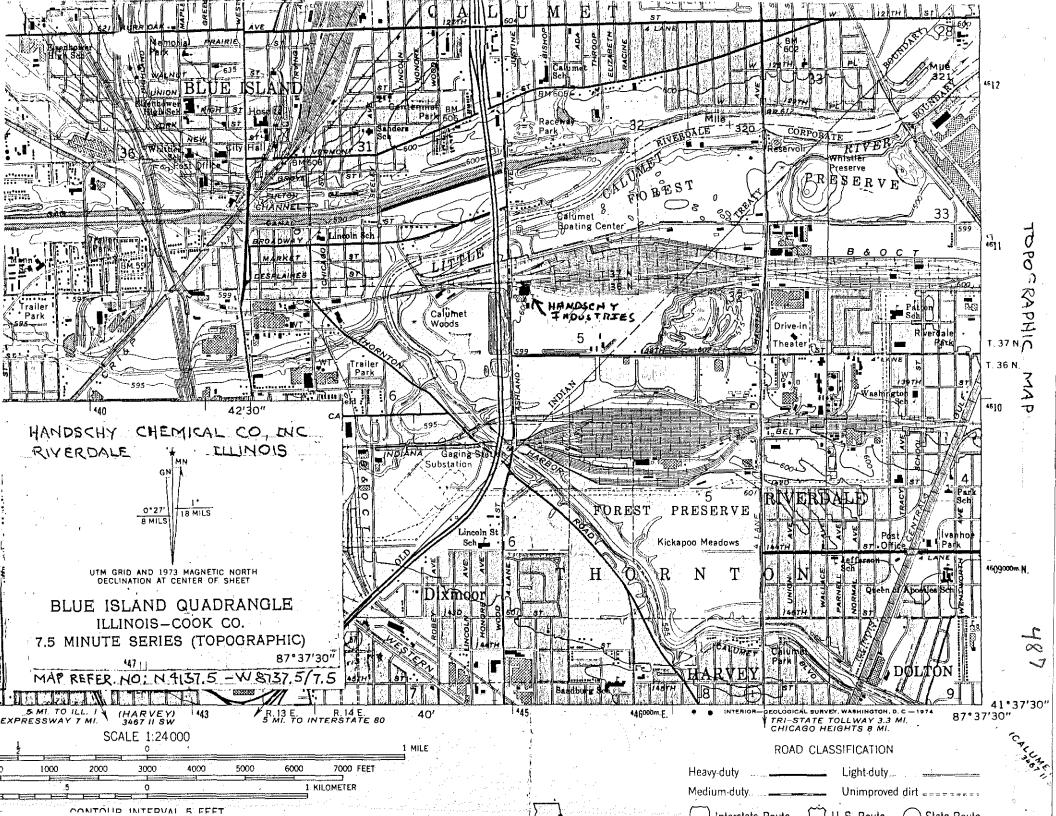
JUN 1 7 1982

WASTE MANAGEMENT BRANCH EPA, REGION V.



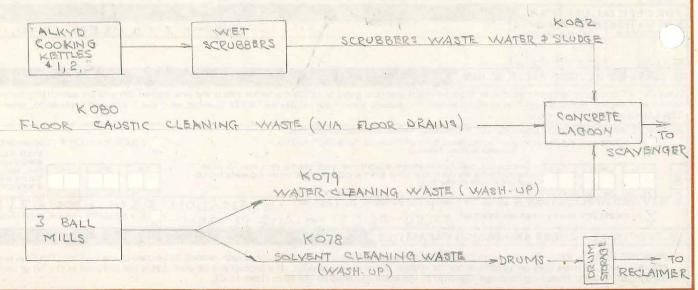
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1 SFPA GEN	onsolie	dated	Permits Pi		44	14.	3 T/A
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PA I.D. NUMBER WOTE TO US	ER	14	NO 1	If a preprinted label has be it in the designated space, ation carefully; if any of it	Review	w the	inform
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MAILING ADDRESS PLEASE PL	ACE	LAI	RET IM	proper fill—in area(s) belo complete and correct, you	w. If need	the not c	label comple
	/	//	11	Items I, III, V, and VI (in must be completed regard items if no label has been	less).	Com	plete a
I. FACILITY LOCATION	//	/	///	the instructions for deta tions and for the legal at	iled	item	descri
	7	/		which this data is collected.			
II. POLLUTANT CHARACTERISTICS	wheth	er voi	u need to	submit any permit application forms to the EPA. If you ans	wer "	yes" t	o any
questions you must submit this form and the sunnleme	ntal fo	rm lis	sted in the	e parenthesis following the question. Mark "X" in the box in ou need not submit any of these forms. You may answer "no	the th	iiru cc	Humm
is excluded from permit requirements; see Section C of the	ne instr	uction	ns. See als	o, Section D of the instructions for definitions of bold—faced	term	S	
SPECIFIC QUESTIONS	YES	MAR NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	K 'X' FOR ATTAC
A. Is this facility a publicly owned treatment work which results in a discharge to waters of the U.S.		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a		X	
(FORM 2A) C. Is this a facility which currently results in discharge	16	17	10	discharge to waters of the U.S.? (FORM 2B) D. Is this a proposed facility (other than those described)	19	20	21
to waters of the U.S. other than those described in A or B above? (FORM 2C)	n 22	23	24	in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	25	26	27
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	of X		x	 F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum con- taining, within one quarter mile of the well bore, 	И	×	
G. Do you or will you inject at this facility any produce	28 d	29	30	underground sources of drinking water? (FORM 4) H. Do you or will you inject at this facility fluids for spe-	31	32	33
water or other fluids which are brought to the surfaction connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of	e D-	X	1	cial processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combus-	14,	X	
oil or natural gas, or inject fluids for storage of liqui	d 34	35	36	tion of fossil fuel, or recovery of geothermal energy? (FORM 4)	37	38	39
 Is this facility a proposed stationary source which one of the 28 industrial categories listed in the is structions and which will potentially emit 100 tor 	7-	×		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons		X	
per year of any air pollutant regulated under the Clean Air Act and may affect or be located in a	ie	//		per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment			
attainment area? (FORM 5) II. NAME OF FACILITY		A1	and the	area? (FORM 5)	43	44	45
SKIP HANDSCHY CHEMI	CA	<u>L'</u>	IND	USTRIES INC	69		
V. FACILITY CONTACT		42.1		B. PHONE (area code & no.)			
A. NAME & TITLE (last,	TT			DENT 312 597 7990	5		
5 16 V. FACILITY MAILING ADDRESS			ecter)	45 46 - 48 49 - 51 52 - 55			CINE I
A. STREET OR P.	э. вох	T	1 1 1				
3 1 3 6 0 1 SO A SHLAND	<u>A</u>	VE		45			
B. CITY OR TOWN	1,1			C.STATE D. ZIP CODE			
4 RIVERDALE				40 41 42 47 - 51			
VI. FACILITY LOCATION A. STREET, ROUTE NO. OR OTHER	R SPEC	IFIC	IDENTIF	IER CONTROL OF THE CO			
5 13601 SO ASHEADA	4 6		1 1 1	45			
B. COUNTY NAME		4		49			
COOK				70			
C. CITY OR TOWN	1 1	1	111	D.STATE E. ZIP CODE F. COUNTY CODE			
3 RIVEDALE				40 44 65 47 - 51 52 - 54			
EPA Form 3510-1 (6-80)				NUV 19 1980 CONT	INUE	ON	REVE

ONTILIUSD FROM THE FRONT		Color Of Color	
VII. SIC CODES (4-digit, in order of priority) A. FIRST		B. SECOND	
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C. THIRD	15 16 -	D. FOURTH	
57 (specify)	c T 7	- (specify)	
S 16 - 19	15 16 -	19	
7III. O ENATOR INFORMATION	A. NAME		B. Is the name listed Item VIII-A also t
HANDSCHY CHEMICA	7 60		owner?
5 16			YES NO
C. STATUS OF OPERATOR (Enter the appropr F = FEDERAL M = PUBLIC (other than fede		ther", specify.) D. PHONI	E (area code & no.)
S = STATE O = OTHER (specify) P = PRIVATE	M	A 312	597 7990
E, STREET OR P.	D, BOX	[15] [10 - 10]	10 - 21] 22 - 23
3601 SO ASHLAND	AYE		
F. CITY OR TOWN	G.S	TATE H. ZIP CODE IX, INDIAN LAND	>
RIVERDALE	I	116005/	ted on Indian lands?
5 16	40 41	42 47 - 51 YES	☑ NO
C. EXISTING ENVIRONMENTAL PERMITS			
A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Propo		
9 N N NONE 9	P NONE	30	
B. UIC (Underground Injection of Fluids)	E. OTHER (specify)		
NONE 9	NONE	(specify) 30 NOTE TO USE	PA: ITEMS
C. RCRA (Hazardous Wastes)	E. OTHER (specify)		
OR NONE 9	NONE	(specify) X - A, B, C	, D, E, E ARE
15 16 17 18 - 30 1 XI, MAP	5 16 17 18	30 101 17860	CAUL
Attach to this application a topographic map of the outline of the facility, the location of each treatment, storage, or disposal facilities, and each water bodies in the map area. See instructions for	of its existing and proposed in the well where it injects fluids or precise requirements. ATTACHE	take and discharge structures, each ounderground. Include all springs, rive	f its hazardous waste
XII. NATURE OF BUSINESS (provide a brief description	<u>n)</u>		
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			237748
Cally Late			
		AV CHUTHEV C	E_120.54
XIII. CERTIFICATION (see instructions)			
I certify under penalty of law that I have personattachments and that, based on my inquiry of application, I believe that the information is to false information, including the possibility of file.	f those persons immediately re ue, accurate and complete. I ar	sponsible for obtaining the information	tion contained in the
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE		. DATE SIGNED
MR WILLIAM SPORT, GEN. MANA	GER MI-01 =	00 2	11 10 00
COMMENTS FOR OFFICIAL USE ONLY	" Mes	y / Xvou	11-19-80
CONTINENTS FOR OFFICIAL USE UNLT			
<u>c</u>			La receive and the
C 15 16 PA Form 3510-1 (6-80) REVERSE			55



III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.



IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE METRIC UNIT OF MEASURE CODE
POUNDS......P KILOGRAMS......K
TONS......T METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

18.0			EP/				JNIT			D. PROCESSES								
LINE NO.	WA	157	AR COC	10	B. ESTIMATED ANNUAL QUANTITY OF WASTE	St (e	SURE (enter code)		1. PROCESS CODES							s		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-2	D	0	0	2	400		P	T	0	3	D	8	30					Local Line
X-3	D	0	0	1	100		P	T	0	3	D	3 (3'0				1 :	
X-4	D	0	0	2	BESIDE AND							1						included with above

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NO L' EPA ED. NO RECEIVED + Continued from page 2. have more than 26 wastes to list. NOTE: Photocopy this page before completing if yo Form Approved OMB No. 158-S80004 FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) DUP DUP ESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE HAZARD. 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 27 - 29 27 - 29 27 - 29 27 - 29 TO | SEE K078 P 140 000 DRUMS REMOVED BY RECLAIMER K079 P HAULED AWAY BY SCAVENGER TO 2 D83 500000 3 KO 0 P TO2 D83 11 14 10 4. 100000 4 K085 P TO2 D83 11 1 1 11 11 100000 5 6 8 9 10 13 14 15 16 18 19 20 21 23 25 EPA Form 3510-3 (6-80) **CONTINUE ON REVERSE**

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IV. DESCRIPTION OF HAZARDOUS WASTLS (continued) E. USE THIS SPACE TO LIST ADDITIONAL PROCESS COL	DES FROM ITEM D(1) ON PAGE	3.	
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EPA I.D. NO. (enter from page 1)			
V. FACILITY DRAWING			
All existing facilities must include in the space provided on page 5 a sc. VI. PHOTOGRAPHS	ale drawing of the facility <i>(see instruct</i>	ions for more detail).	
All existing facilities must include photographs (aerial or grout treatment and disposal areas; and sites of future storage, treat	und—level) that clearly delineate a	Il existing structures; existictions for more detail).	ng storage,
VII. FACILITY GEOGRAPHIC LOCATION			
	REFER TOPOG. MAP F TEM XI FORM 1.	UDE (degrees, minutes, & second 4 - 1 3 7 3 - 0	mus)
VIII. FACILITY OWNER			
A. If the facility owner is also the facility operator as listed in Seskip to Section IX below.	ction VIII on Form 1, "General Inform	nation", place an "X" in the b	ox to the left and
B. If the facility owner is not the facility operator as listed in Sec			and the second second
1. NAME OF FACILITY'S LE	GAL OWNER	2. PHONE	NO. (area code & no.)
E 15 16		55 56 - 58 59 5. ST.	6. ZIP CODE
3. STREET OR P.O. BOX	4. CITY OR TOWN	3.31	o. Zir cobe
F G	116	40 41 42 47	51
IX. OWNER CERTIFICATION I certify under penalty of law that I have personally examined documents, and that based on my inquiry of those individuals submitted information is true, accurate, and complete. I am a	s immediately responsible for obta	aining the information, I be	elieve that the
including the possibility of fine and imprisonment.	wate that there are digitalisant por		
MR WILLIAM SPORI, GEN MANAGER	Villian O Las	S C. DATE SIGN	- 90
X, OPERATOR CERTIFICATION	week o spo		NOTES STORE
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MR WILLIAM SPORT, GEN. MANAGER. N	Elleon O Spor		PO CONTINUE ON PAGE

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

- 9	This re	port is for the	ne calendar	year ending	Decemb	er 31, 1983.		
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Phone No. (area	code & no.)							IEPA-DLPC

This Agency is authorized to require this information under Illinois Revised Statutes, 1981. Chapter III-1 2, Sections 1004 and 1021 (f)(2. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continues, a fine up to \$1,000,000.00 and imprisonment up to 5 years. This form has been approved by the

Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, Thelieve that the submitted information is true, accurate and complete. I am aware that there are senificant penalties for submitting false information, including the possibility of tine and imprisonment.

FRANK BUTLER, SOPERINTEN DENT
Title Signatur Signature of Authorized Representative

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY GENERATOR ANNUAL HAZARDOUS WASTE REPORT

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This report is for the calendar year ending December 31, 1983.

(cont.)

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XIII. FACILIT	Y'S ILLINOIS EPA I.D. NO. XIV. FACILITY'S N	IAME / A	ADDRESS
918	60		CHEMICAL SERVICE Phone (312) 768-34
XV. WASTE	IDENTIFICATION P.O. Street (P.O. Box)		190, GRIFFITH, DID 46319 State Zip
A. LINE NO.	B. DESCRIPTION OF WASTE	C. USDOT Hazard Code	D. RCRA HAZARDOUS WASTE NO. (see instructions) E. AMOUNT OF WASTE (lbs. / gal.)
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GENERATOR ANNUAL HAZARDOUS WASTE REPORT 60

	This report is for calendar year ending December 31, 19	983 (cont.)
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X. GENERAT	OR'S USEPA I.D. NO. XI. GENERATOR'S ILLINOIS EPA I.D. NO).
18 L D	005104443	
v./vi. genef	RATOR'S NAME/ADDRESS	
Name	HANDSCHY CHEMICAL CO	Phone 312) 597- 7990
1360		ILLINOIS 60627
Street (P.O.		, State Zip
	B. TRANSPORTER'S NAME /	C. TRANSPORTER'S D.
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SEP 04 1984

IEPA-DLPC



August 30, 1984

Mr. Gregory T. Zak, Manager Compliance Assurance Unit, Monitoring Section Division of Land Pollution Control Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706

Supject: IEPA General Annual Hazardous Waste Report - For 1983 0312580001G - ILD005104443

Gentlemen,

In reply to your subject letter of August 16, 1984, we attach pages 001, 002, 003 of 3 of our report for 1983.

The matter of possible delay in responding to your August 16, letter was discussed by our consultant, A.P. Ferrucci, with Ms. Hope Wright on August 27. Ms. Wright advised it would be satisfactory if filing was completed by September 12, 1984. We appreciate this extension

Frank Butler

Plant Superintendent

Enclosure: Generator Annual Hazardous

Waste Report for 1983 Pages 001, 002, 003 of 3

RECEIVED

SEP 04 1984

IEPA-DLPC

A.3 Groundwater/Soil



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

23 MAR 1987

TO:

Arlene Kaganove

FROM:

Mary Drake

Re:

Handschy Industries

As you know we have been discussing the proper course of action to follow regarding Handschy. The problem presented is this: Sampling of Handschy's waste water pit shows the presence, in quite minute levels, of lead. At the levels found the waste water is not E.P. toxic. However, if the lead is present in the waste stream because Handschy used inks containing chromium and lead then this waste stream should be regulated as KO86. The Illinois EPA thinks the waste is KO86 and has asked U.S. EPA to file a RCRA action against Handshoy. We asked Handschy to provide us with documentation of the materials it uses and also had a consultant go out to observe the process and to sample. We then requested an expert in the ink industry to review the Handschy documents and the consultant's report. His opinion was that establishing that Handschy used inks, soaps or stabilizers containing chromium or lead would be difficult, time consuming, and perhaps, simply not possible.

I recommend that the most efficient way to handle this problem and to insure that we do our job properly is to require Handschy to test all waste streams from the pit being removed for disposal for EP toxicity. Instruct them that if it is EPA toxic it must be disposed of at a properly permitted facility for hazardous waste. I recommend this course of action instead of contining to attempt to prove that Handschy produced a KO86 waste stream, which it may not have done. We will, in this fashion, be protecting the environment from improper disposal of a waste stream containing impermissible levels of lead.

I also recommend that we compensate our ink industry expert for his report and inform him we do not contemplate any further need for his services.

Land and Lakes Co.

123 N. NORTHWEST HIGHWAY (312) 825-5000

P. O. BOX 778
PARK RIDGE, ILLINOIS 60068-0778

September 29, 1986

Mr. John F. Ward, Jr. O'Keefe, Ashenden, Lyons & Ward 1 First National Plaza, Suite 5100 Chicago, IL 60603

Re: Handschy's Soil Tests

Dear John:

Enclosed please find a table summary of the soil analysis that was done at Handschy's facility for lead concentration. I have also enclosed a copy of the article that recently appeared in the Chicago Tribune regarding lead found in area parks. The results clearly demonstrate that the elevated levels which are present in the soil have certainly resulted from airborne sources. Although it is inconclusive, it may be useful in demonstrating the potential source of the lead recently found in Handschy's pit.

I trust that the information that you have recently received will be sufficient in removing the Handschy matter from EPA's investigation.

If you have any questions, please do not hesitate to contact me at any time.

Sincerely,

LAND AND LAKES COMPANY

James T. Ambroso Environmental Manager

JTA:bmk

Enclosure

HANDSCHY SOIL LEAD ANALYSIS 9/23/86

I-57 Road Bank=	40	mg/kg
Ashland Avenue Ditch (west) =	158	mg/kg
Ashland Avenue Ditch (east)=	123	mg/kg
Handschy Parking Lot Soil=	286	mg/kg

Per Gulf Coast Labs 9/29/86

BGA hits city health officials in dispute over lead study

State says playground may be safer than back yard

By Jack Houston

A study conducted early this year for the Chicago Department of Health found that at least 21 playlots in city parks had unusually high levels of lead in tested soil samples.

But the head of the state's Childhood Lead Poison Control Program said Wednesday that the findings also show that city playgrounds may be safer than a child's own back yard.

The conflicting interpretations emerged after the Better Government Association distributed a list of test results and sites Wednesday, which had not been released in July when the study results were made public. The BGA accused city health officials of attempting to suppress the list.

Adding to the confusion was different ways test data is measured. The BGA, which said 44, not 21, of the parks were "dangerous," multiplied hase test findings by a factor of 5 to compensate for higher concentrations of lead found near the surface of the soil samples.

Terrence Brunner, the BGA's executive director, called the parks "a toxic lead mine field" and said Chicago health officials have known results of the party circum 2.2 city by Argonne National Laboratory and the Illinois Department of Public Health. Similar soil samples tested two years ago in the city's parks also indicated a lead problem. The tests also indicated that areas near busy highways show higher levels of lead in the soil because of vehicle emissions.

Based on the recent tests, the city's health commissioner, Dr. Lonnie C. Edwards, issued a statement July 3 urging parents not to picnic near heavily traveled expressways or busy streets because of the potential of exposing children to lead-tainted soil. Attached to a copy of his statement was a five-page description of the soil study.

"The release was never meant to inform," Brunner charged.

The list distributed Wednesday was obtain from an undisclosed source during a joint investigation with WMAO-TV [Channel 5].

Edwards, in an interview Wednesday, said he did not release the information in July because "I felt it could be misinterpreted. It could cause more harm without translating it. The park, as a whole, is not unsafe. It becomes unsafe only when the dirt becomes dust."

soil would put a toxic level of lead in a child's body. Edwards said the correct estimate is 3 pounds.

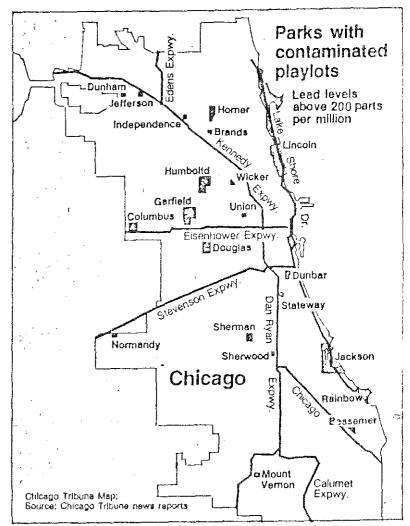
The permissible limit of lead in soil is 200 parts per million, according to state public health regulations adopted in 1982 as part of the Illinois Lead Poisoning Prevention Act.

Tests conducted for the city showed that 21 park playgrounds contained soil with lead levels above that standard. Highest lead levels wer found at Horner Park playground, 713 parts per million, and Stateway Park play area, 684 parts per million, according to the data.

But Mildred Fort, director of the state Department of l'ublic Health's Childhood Lead Poison Control Program, said it was "not unusual to have a level of 1,000 in any urban area, particularly in home yards.

"That's where we disagree with Argonne, which is interested in effects of auto emissions from leaded gasoline," Fort said.

Sarah LaBelle, who directed the tests for Argonne, was available for comment. However, a spokesmen for Argonne said she would respond to questions during a Thursday.



Meanwhile, a spokesman for the eral options to deal with the lead



September 24, 1986

Mr. James T. Ambroso Environmental Manager Land and Lakes Company 123 North Northwest Highway Post Office Box 778 Park Ridge, Illinois 60068



Dear Jim:

In June of 1982 our waste water pit was completely cleaned out. The procedure used to empty the pit went as follows:

The first operation was to remove all of the waste water existing in the pit. The waste water was shipped to C.I.D. using our tank truck. The next step was done with a backhoe. The backhoe was rented from Chicago Equipment Rental for digging the sludge from the bottom of the concrete pit.* This bottom sludge was sent to C.I.D. in open top boxes. When all the sludge was removed, the Corrective Maintenance Company was called to power clean all the drains which empty into the pit.* High pressure hoses with steam flushed the drains, drain pipe and pit. When this was completed, all remaining waste water and sludge was pumped to our tanker and then shipped to C.I.D. When the project was completed, the collection pit was "empty," per 40CFR Part 261 of the Environmental Protection Agency Rules and Regulations.

As support documents, I have enclosed copies of the associated bills for equipment and cleaning service. Copies of the shipping manifests are also included for your records.*

Sincerely,

HANDSCHY INDUSTRIES INC.

David W. Dory

*See attached exhibits

DWD/nsz

EXHIBIT A

INVOICE FOR BACKHOE EQUIPMENT



8522 SOUTH PULASKI ROAD - CHICAGO, ILLINOIS 60652 PHONE: 284-5750

DAILY HOURS MONDAY THRU FRIDAY 7:30 TO 5:30 SATURDAY 7:30 TO 5:00 SUNDAY 8:00 TO 12:00

SHIP HANDSCHY INDUSTRIES TO 13601 S. ASHLAND RIVERDALE, IL. 60627

RENTED TO

6-15-82

CONTRACT NO. 81571

CUSTOMER ORDER NUMBER

P.O.# 186324

PLEASE REMIT FROM , THIS INVOICE.

RENTAL DATE: TO RENTAL DATE: FROM

6-12-82

6-9-82

TERMS: NET 10 DAYS
11/4 PER MONTH LATE CHARGE

AFTER NET DUE DATE

DESCRIPTION	DAY	WEEK	нтиом	
I.H.BACKHOE CNE FITTING	175.00			350.00 6.00
8 - 50 FT. 2" DISCHARGE HOSES @ \$5.0 TRANSPORTATION CHARGES (\$30.00 EAC	0 PER DAY EAC	S (\$40.00)	ALES TAX	.42 80.00 60.00
13 GALS. FUEL @ \$1.50 PER GAL.	1	O. K. T	YA9 C	19.50 515.92
JUN 1982 HANDSCHY				515.92

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HANDSCHY INDUSTRIES, INC.

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CHICAGO EQUIPMENT RENTAL 8522 S. BURASKI CHICAGO, ILLINOIS 60652



& THYOICE IN DUPLICATE TO HANDSCHY INDUSTRIES, INC. 13601 S. ASHLAND AVE. RIVERDALL, ILLINOIS 6062

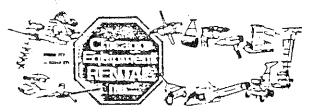
6/4/82	DELIVER	F.O.B.	TERMS:	OUR CODE	
BACKHOE :	z4™ scoop	\$175.00 per day \$ 60.00 DELIVERY	& PICI UP	i	



COMFIRMATION

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OUR RECEIVING DEPARTMENT CLOSES AT 4:00 P.M.



NAME

RENTAL AGREEMENT

INVOICE NO

E522 SOUTH PULASKI ROAD, CHICAGO, ILLINGIS 60652 PHONE: 284-5753

MONDAY THRU FRIDAY 7:30 TO 5:30 SATURDAY 7:30 TO 5:00 SUNDAY 8:00 TO 12:00

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for such amount as may appear to be unpaid and due hereunder together with reasonable costs of collection including attorney's fees, to waive and releast errors which may intorvene in any such proceedings, and to consent to immediate execution upon such judgment, hereby ratifying and confirming all that attorney may do by virtue hereof. If this Contract is signed by more than one person, all obligations and authorizations hereunder shall be joint and several.

PURCHASE ORDER

PURCHASE ORDER

8522 SOUTH PULASKI ROAD CHICAGO. ILLINOIS 60652 PHONE: 284-5750

THIS NUMBER MUS SHIPPING PAPERS PACKAGES AND ALI CORRESPONDENCE

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EXHIBIT B

INVOICE FOR CORRECTIVE MAINTENANCE COMPANY

COPRECT MAINTENANCE CORP.

2000 Dombey Road, Portage, Indiana 46368

219/885-1410 emergency response: 219/762-2167 INVOICE

June 24, 1982

Invoice No. 10699

HANDSCHY INDUSTRIES, INC. 13562-62 Attn: Accounts Payable 13601 South Ashland Avenue Riverdale, IL 60627

Handschy Industries, Inc. 8" Sewer Line and Catch Basin, Riverdale, IL CMC Job No. 6211-I (G-26)

CHARGEOUR P. O. No. 186362 1/2.TO FLEXO 1/2.TO FARAG

FINAL BILLING

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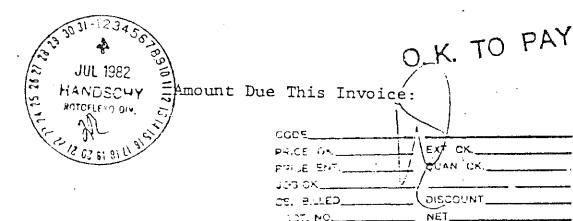
6/18/82

SHIFT

8:00am-4:30pm

AMOUNT

\$772.40



\$772.40

HANDSCHY INDUSTRIES, INC.

CORRECT MAINTENANCE CORP. 2000 DOMBET ROAD PORTAGE, INDIANA 46368

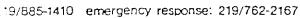
* ENVOICE IN DUPLICATE T HANDSCHY INDUSTRIES, INC. 13601 S. ASHLAND AVENUE RIVERDALE, ILLINOIS 60627

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ORF, OT MAINTENANCE CORP

3 7 Sombey Road, Portage, Indiana 46368





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Riverdale, IL.	60627 ATTN: Accou	ınts Paya	ble					
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CORRECT MAINTENANCE CORP.

2000 Dombey Road, Portage, Indiana 46368

219/885-1410

emergency response: 219/762-2167

INVOICE

June 24, 1982

Invoice No. 10699

HANDSCHY INDUSTRIES, INC. 13562-62 Attn: Accounts Payable 13601 South Ashland Avenue Riverdale, IL 60627

Handschy Industries, Inc. 8" Sewer Line and Catch Basin, Riverdale, IL CMC Job No. 6211-I (G-26)

Your P. O. No. 186362 Terms: Net 30 Days

FINAL BILLING

DATE

0/18/82

SHIFT

8:00am-4:30pm

AMOUNT

\$772.40

Amount Due This Invoice:

\$772.40

THANK YOU VERY MUCH FOR YOUR BUSINESS

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EXHIBIT C IEPA MANIFESTS FOR SHIPMENT

D BE COMPLETED BY ASTE GENERATOR

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ENVIRONMENTAL PROTECTION AGENCE DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

SPECIAL WASTE HAULING MANIFEST

Authorization Number 7 8 0 5 C

MON HAZADI

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(Company Name)	13601 S. ASH Address	HAND AVI	EN. 3 1 2	-5 <u>9</u> 7 7 9 9 0	O 3 1 2 5 8 0 0 0
RIVERDALE City		60627	_	_	
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Hauser Name 31()3 E & 79th STI Hauler Address	REET		S.W	H Registration Number Ω 2 7 4 Ω (
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T D Y LOUDETT			STORAGE OR TREA	ATMENT SITE	
I.D. LANDFILL (Facility Name)	CAL. CITY	ILLI			3 1 6 0 0
LALUMET CITY	ILLINOIS		60409	•	2) Pile Mnwoer
City	State		Zip ·	Phone Number	EPA Number
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LEINOIS 217 / 782-3637			SPILL ASSISTANC		OUTSIDE PLEISIDIS 800 / 424-8802 or 290 425
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GENERATOR COPY - PART 1 - DO MOT REMOVE PART 1 FROM SET UNTIL COMPLETED

O BE COMPLETED BY VASTE GENERATOR

LUNOIS 217 / 782-3637

STATE OF ILLINOIL

- VIRGNMENTAL PROTECTION A DI DIMISION OF LAND POLLUTION COLUTROL

(217) 782-6760

OUTSIDE ILLINOIS 800 / 424-8602 or 202 1 426-25

2205 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 Authorization Number 7 8 0 5 SPECIAL WASTE HAULING MANIFEST NON HAZARDOUS 13601 S. ASHLAND AVE. 312-597-7990 OSCHY INDUSTRIES, INC. (Company Name) Address Phone Number ILLINOIS RIVERDALE EPA Number WASTE HAULER(S) PANOZZO DISPOSAL SERVICE 12322 ASHLAND AVE. S.W.H. Registration Number 0 2 0 9 0 Haurer Address Hauler Name SAME AS ABOVE Hauler Name Hauler Address Phone Number EPA Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE CALUMET CITY, ILLINOIS D. LANDFILL Agoress 60409 ILLINOIS ALUMET CITY State Phone Number EPA Number Alternate (Facility Name) Address Site Number City State Phone Number EPA Number TO BE COMPLETED BY HASTE GENERATOR LIQUID PIGMENT SOLVENT WATER WASTE PHASE. (Liquid, Gaseous, Sond) WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARO CLASSIFICATION INDICATED IMMEDIATELY BELOW HAZARD CLASS: SHIPPING DESCRIPTION: UN or NA Number NON FLAMMABLE LIQUID EPA HW Number BULK LIQUID WEIGHT FOR I.E.P.A. USE MUST BE MEIGHT FOR QUANTITY OF WASTE DELIVERED: 0 0 CONVERTED TO CU. YOS. OR GAL. TONS (circle one) O T USE METHOD OF SHIPMENT (Circle One) (DRUMS, TANK TRUCK OPEN TRUCK OTHER (Specify) _ Number THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED. DESCRIBED. FD. MARKED. AND LABITED AND IS IN PROPER CONDITION FOR TRANSPORTATION. ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTM ION AND LE HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION WILLIAM A. SPOR:Inorized Signatures WASTE HAULER I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED: DATE 5 1 101 8 (Authorized Signature) (Authorized Signature) SISPOSAL, STORAGE, OR TREATMENT FACILITY" HAZARDOUS WASTE SUBJECT TO FEE YES. HERERY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE DATE = 0 6/10/ 8= (Authorized Signature) MMENTS OR SPECIAL INSTRUCTIONS.

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TO BE TO LETED BY WASTE CENERATOR

EIVISION OF LAND POLLUTION CONTROL 2000 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

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Authorization Number 7 8 0 5

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ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 050_359

(217) 782-6760 SPECIAL WASTE HAULING MANIFEST Authorization Number 7 8 0 5 9 0

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	SPE	CIAL WASIE HAC	ILING MANIFEST	NON HAZARDOUS	1.3
IDSCHY INDUSTRIES. INC.	13601 S. AS	HLAND AVE.	312-597-7990 Phone Number	0 3 1 2 5 8 0 0 0	1 G
(Company Name)	Adares	SS .	Phone Number	14 Generator Number	24
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ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

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(217) 782-6760 SPECIAL WASTE HAULING MANIFEST Authorization Number 7 8 0 5 9

NON HAZARDOUS

Company Name	13601 S. ASILA	ND AVENUE 31	2-597-7990 Phone Number	0 3 1 2 5 8 0 0 0 1
RIVERDALE	ILLINOIS	60627		
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NC S 217 · 782-3637		MERGENCY AND SPILL AS		OUTSIDE ILLINOIS 800 / 424-8802 or 202 / 426-2875

O BE COMPLETED BY VASTE GENERATOR

JIMI. ILLINACID

ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

Authorization Number 7 8 0 5 9 0 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

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City	State	Zı	D Phone	Numper	EPA Number
O BE COMPLETED BY VASTE GENERATOR WASTE NAME: PI	GMENT SOLVENI	' WATER			LIQUID
SHIPPING DESCRIPTION: BULK LIQUID	HAZARD CLASS: NON FLAMMABLE	LIQUID	UN or NA Number		EPA HW humber
EIGHT FOR LBS O.T. USE TONS (circle one)	WEIGHT FOR LE P.A. CONVERTED TO CU.		NANTITY OF WASTE DELIVER	0 0 1 ED: <u>17</u>	0 0 0 1 GALLONS (Circle Or 2 CU. YOS. 53
METHOD OF SHIPMENT (Circle One) (DRI	JMS) 1	TANK TRUCK	PEN TRUCK OTHER (Specify)	
HIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE	ARE PROPERLY CLASSIFIE	D. DESCRIBED, PACK	AGED. MARKED. AND LABEE		PER CONDITION FOR TRANSPORTATION
HIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE CACCORDANCE WITH THE APPLICABLE REGULATIONS HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTE	4	file 1	E Econzec Signature	all.	DATE. 6-14-82
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	9			-	1 11:10
(Authorized Signature)	MUKA				DATE (2) 14) 8
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(Authorized Signature)					DATE:
SPOSAL, STORAGE, OR TREATMENT FACILITY"	40 40 40 40 40 40 40 40 40 40 40 40 40 4		Н	AZARDOUS WASTE	SUBJECT TO FEE YES NO
HEREBY CERTIFY THAT THE ABOVE DESCRIBED WAS	TE AND INDICATED QUANT	ITY HAS BEEN ACCE	PTED AT THE SITE SPECIFIED	D ABOVE	
(Authorized Signature)	Lynn				DATE OG / Y
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JUMBEN SPECIAL INSTRUCTIONS.					,
LEINOIS 217 782-3537			PILL ASSISTANCE NUMBER	94916.GE	UTS:0E (LL(1:0)\$ 800 424-8502 cr 20? / 426-

O BE COMPLETED BY VASTE GENERATOR

STATE OF ILLINOIS

ENLIFONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 <u>0552334</u>

(217) 782-6760 Authorization Number 7 8 0 5 9 0
SPECIAL WASTE HAULING MANIFEST 13

ANDSCHY INDUSTRIES, INC.			31 25 9 7 7 9	<u>90 0 3</u>	1 2 5 8 0 0 0 1
(Company Name) RIVERDALE	Addres ILLINOIS	60627	Phone Number	1.4	Generator Number
City	State	Z ₁₀			EPA Number
		WASTE HA	AULER(S)		CLY MANOEL
THE LIST OF	100				
	103 E. & 79th	STREET		S W H Registrat	ion Number 0 2 7 4 0 0
Hauser Name	Hauler Address				25
		Francisco Contractor	Phone Number		EPA Number
AME AS ABOVE			•	S.W.H. Renistral	
Hauler Name	Hauter Address				non Number 0 2 7 4 0 0
			Phone Number		
	DESTINATI	ON — DISPOSAL STO	DRAGE OR TREATMENT SITE		EPA Number
.I.D. LANDFILL	CAL. CITY				0316003
(Facility Name)		doress	All the Control of th		39 Sile Number
ALUMET CITY	TLLINOIS	604	09	-	•
City	State	Ž	P Phone Numb	per	EPA Number
Alternate (Facility Alama)					
Alternate (Facility Name)	Ac	idress			39 Site Number
City	State	Zıj	Phone Numo	er	EPA Number
O BE COMPLETED BY VASTE O FRATOR		**************************************			
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ASTE HAULER	20. 1				And the second of the second o
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(Authorized Signature)	V		THE CONTRACT OF POSSIBLE PROPERTY OF THE PROPERTY OF THE POSSIBLE PROPE		5 00
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		PART - 1 HALL	-	OUTSIDE PARTA - GENERATOR	FLUNDIS 800 / 424-8802 or 20? 1 426-

GENERATOR COPY -- PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

DIBE CONTUININGY
ASTE GENERATOR

__:NOIS 217 : 782:3537 TRIR::TOX: PART : GENERATOR

PART - TIEPA

P487.35.7E

COMMENTAL PROTECTION AGENCY DWG ON OF LAND POLLUTION CONTROL OD CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 0552336

OUTSIDE ILLINOIS 800 / 424-8802 or 202 / 426-2675

PART 6 - GENERATOR

	2200 CHURCH	HILL ROAD, SPI (217) 78		LLINOIS 62706	Authorization &	7 8 0 5 9 0
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(Company Hame) .	INC. 13601 S AS	HAND AVE	. ——— Pr	none Number	14 1 12	5 8 0 0 0 1 G Generator Number 24
RIVERDALE	ILLINOIS	60627				
City	State	Zip				EPA Number
		WASTE H	AULER(S)			
PVR ANTD Hauler Name	3103 E. & 79th S' Hauser Address	TREET		\$.	W H. Registration Numbe	er <u>0 2 7 4 0 0 1</u>
		-	Phone Nur	nper		EPA Number
SAME: Hauser Name	Hauler Address			S.	W.H. Registration Numb	er <u>0 2 7 0 0 1</u>
			Phone Nu	mper		EPA Number
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C.I.D. LANDFILL (Faculty Name)	Ad	dress	······································		0	3 1 6 0 0 3 0
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City	Stare		Zip	Phone Number		EPA Number
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METHOD OF SHIPMENT (Circle One)		ANK TRUCK	OPEN TRUCK	OTHER (Specify)		53
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24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

PART - 4 HAULER - PART - 5 (EPA



Refer to: 0316000051 -- Cock County
Chicago/Chem-Clear, Inc.
ILD 000608471

ILD 000608471

Waste Stream No. 960323

Date Application Received: March 5, 1986

May 15, 1986

MAY 21 1986

Chem-Clear, Inc. Attn: James R. Laubsted
11800 S. Stoney Island Avenue
Chicago, Illinois 60617

STATE OF ILLINOIS

Dear Mr. Laubsted: " The man the control of the control

This letter is in response to your Special Waste Stream Application for wash water from Handschy Chemical.

o transfer a servicio de la compressió de la compr

Your application for permit to receive this special waste has been denied. You have failed to provide proof that your site will not cause violations of the Illinois Environmental Protection Act and regulations adopted thereunder if you dispose of, treat or store the waste stream described in the permit application. Section 39(a) of the Illinois Environmental Protection Act (Ill. Rev. Stat., 1979, Ch. 111 1/2, par. 1039(a)) requires the Agency to provide the applicant with specific reasons for denial of the permit application. The following reason(s) are given for denial of this permit application:

Several items concerning the classification and treatment of this waste stream needs to be clarified in order for the Agency to complete its review of the application these are:

- The analysis provided with the application indicates a total level of sulfide at 266 ppm and reactive level of sulfide at 44 ppm. Since the waste stream was declared non-hazardous, further information regarding the reactivity hazard of the waste stream is required in order for this declaration to be justified. Specifically, for wastes containing reactive concentrations greater than or equal to 10 ppm for sulfide, the site will be required to provide a statement from the generator indicating that none of the following have occurred:
 - The waste has never caused injury to a worker because of hydroden à. sulfice concration:
 - That the CSHA work place air concentration limits for hydrogen sulfide have not been exceeded in areas where the waste is concrated. stored or otherwise handled: or
 - That air concentrations of hydrogen sulfide above a few enmissive net been encountered in areas whore the waste is generated, stored or otkerwise handled.



Page 2

If the generator cannot provide this statement, the waste should be assumed hazardous for reactivity (DOC3). In addition, demonstration that this potentially reactive material will be compatible with other wastes to be treated in the same batch needs to be provided.

- The process description provided in the application was incomplete. Please specify the industrial process generating the waste stream that is being stored in the surface impoundment.
- 3. The analysis also indicated a level of toluene at 1990 ppm. Please identify the source of the toluene component in the waste stream, in addition to demonstrating that your treatment proposed for this waste stream will remove this hazardous constituent.

Should you have any questions regarding this denial, please contact Jeanette Virgilio at 217/782-9875.

Very truly yours,

Lawrence H. Eastep, P.E. / Hanager

Permit Section

Division of Land Pollution Control

CPT LWE:JV:rmi/1078F/19-20

cc: Handschy Chemical

Northern Region/_

Division File

This Agency is authorized to require this information under Illinois
Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure
of this information is required under that Section: Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms

Management Center:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL
SPECIAL WASTE, STREAM: APPLICATION

ADM 1067 (REV. 7/84)

This ap	lication is a: (check one)	New Applicatio	n Renewal			Waste Strea	ım Numb
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			APPLICANT	(SITE)				
		ITE ADDRESS		gen interpresentation of the second	Carrier S	APPLICANT /	ADDRESS ≉	1251 1251
Name:	Chem-Clear,	Inc.		Name:	43.224			
Address	11800 S. St	ony Island A	venue	Address:				133 47
C _O	ok / Chi	.cago / II	/ 606I	7	1 7		ji i i i i i i i i i i i i i i i i i i	
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Site Co	rtact Name	J-AMES -	LAUBSTEI	∡ 35 ∑ Jelephone	_312 ·	646	6202	
The und	ersigned hereby mak	es application i	for a supplement	al permit for th	e storage,	treatment (or disposal	of th
	tream and certifies	والمتسينية أأراف أبيث المتدارة والمتشارة	aberra 🥢 🖺 😘 🖭	Signature	~~ / 1 history 1	ر وزار از این این مست		
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CARD	(FOR AGENCY USE LPSW)	WASTE STREAM NUMBER (AUTHORIZATION) 8	TRANS CODE DA	The state of the s
TYPE		WASTE CHARACTE	RISTICS	
	This waste is: (check one) - Conservation and Recovery Act in Title 35 - Subtitle G. Par	, and regulations adopted the	ardous as defined by U.S.E. reunder, and the Illinois F	P.A. in the Resource
4 0 7	USEPA Hazardous Waste Number(s)			
	Total Annual Waste Volume	25 - 28 29 - 32 33 スクロカカ	38 37 40 41 Volume Units 2	44 45 48 Waste Phase 3 62
	Transport Frequency 3	Waste Class (Agency Use) 64 65	1 = CUBIC YARDS	1 = SOLID
	1 = ONE TIME 5 = MONTHLY 2 = DAILY 6 = BI-MONTHL 3 = WEEKLY 7 = QUARTERL 4 = BI-WEEKLY 8 = SEMI-ANNI	Y	2 = GALLONS	2 = SEMI-SOLID 3 = LIQUID 4 = GAS 5 = POWDERS
6 0 6 7	COMPONENT NAME	PERCENT	COMPONENT NAME	PERCENT
6 /	1 21 22	WATER 95.7	2 PAINTS	SDUBS 4.
	3	43. 44	4	70 71
	5		6	
5 0 6 7	Flash ≥ 2 $\geq 12^{\circ}$ F Acidity	Percent Alkalinity	рн 7.3	Total Solids 4.32
	Solid Waste: Fire Hazard	Corrosive	Reactive	
		TOTAL (ppm)		REACTIVE (ppm)
7 <u>0</u> 6 7	Sulfide 1 3 21 22 23	266.0	Sulfide	44.0
	Cyanide $0 1$	5.0	Cyanide	38
	Phenol 1 4			
	METAL KEY	EP TOXICITY (ppm)	METAL KEY	EP TOXICITY (ppm)
	Ag $\frac{0}{2i} \frac{3}{22} \frac{3}{3i}$		Hg 0 4 39 40	49 56
	As <u>0 5</u>			
	Ba <u>O 7</u>		Pb	
	Cd 0 9		Se <u>1 0</u>	<u> </u>
	Cr <u>1 1</u> ENDRIN 1 5		LYMPANC	
8	ENDRIN 1 5 METHOXYCHLOR 1 7	· <u></u>	LINDANE 1 6 TOXAPHENE 1 8	·_
	2, 4 - D <u>1 9</u>		2, 4, 5 - TP 2 0	
8 <u>0</u> 6 7	21	I-CLEAR	40	
	Certification Number:		viewed by: $\frac{1}{51} - \frac{1}{53} = \frac{1}{54}$	56

r. 2261				LAB ANALYSIS	10d 3
YN			(영니릭/사) :	OKACCEPT	Γ∴ REJEC
	1	1800 S. Stor	ny Island Avenue		
MIT #			Ilinois 60617	PRICE	
· 사용· · · · · · · · · · · · · · · · · ·			646-6202	QUOTE	
WASTE SOURCE			그는 그는 그는 약한 분들을 다고		
WASTE GENERATOR HAN	NSOHY	(146	mICA/_	-	<u></u>
WASTE DESCRIPTION 1, 4	1 1 1	TEKT	// C/1/	,	
RECEIPT DATE		V	OLUME 250,000	S/XR	
	w	ASTE CHAR	ACTERISTICS		and the second
COLOR/APPEARANCE C. J. ()	(D)		ATER MISCIBILITY	Y E.S	
	18PLE	%	OIL ON ACIDIFICATION	1201	
% FREE OIL	LIQUI.	\wedge			
	1 1	- <u>-</u>			
	As			As	
TEST	Rec.	LEACH.	TEST	Rec.	I.EAC
PH	7,3		Ag, ppm	101	
% TOTAL SOLIDS % DISSOLVED SOLIDS	4.32		As, ppm Ba, ppm	4,5	10,5
	1		Cd, ppm		100
% SUSPENDED SOLIDS % SETTLEABLE SOLIDS	DIST		Са, ррт	1.9	
FLASH POINT S	1,0 12/2 F		Cr (Hex), ppm	117	
OIL AND GREASE, ppm	2940		Cu, ppm	2,8	
PHENOLS, ppm	21.0	1	Hg, ppb	24	
CHLORIDE, ppm	1-110		Ni, ppm	1201	
BROMIDE, ppm	 		Pb, ppm	12.5	4/15
PHOSPHATE, ppm (TOTAL)			Se, ppm	10.1	·
COD, ppm	116,000		Zn, ppm	9.0	1
BOD, ppm			Fe, ppm	30.	
ACIDITY mg/1 as CaCo ₃			B, ppm		
ALKALINITY, mg/1 as CaCo3		<u> </u>			
CYANIDE, ppm (TOTAL)	5.0				
CYANIDE, ppm (RELEASE)					
SULFIDE, ppm (TOTAL)	26lej	·	<i>A</i>		_
SULFIDE, ppm (RELEASE.)	44 1				
MENTO ALLITATION FOLLOWALEN		REATMENT	CHARACTERISTICS		
NEUTRALIZATION EQUIVALEN TREATMENT WITH MIX TANK	1 (pH 10)		(m1 WASTE+	m1 MIX TANK)	
	MIX	MIX +		MIX	MIX
TEST	TANK	Sample		TANK	Samp
% SOLIDS Produced by Volume			IRON, ppm		
% SOLIDS Produced by Weight	, , , , , , , , , , , , , , , , , , , ,		NICKEL, ppm		
COD, ppm			ZINC, ppm		
CYANIDE (TOTAL), ppm			O&G, ppm		
CYANIDE (RELEASABLE), ppm			COPPER, ppin		
BARON, ppm			LEAD, ppm		
CADMIUM, ppm			MERCURY, ppb		
СНЯОМІИМ (TOTAL), ppm		<u> </u>			<u> </u>
CHROMIUM (HEX), ppm					
ACCEPTED:			REJECTED:		
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PAINTEC



Date: April 29, 1986

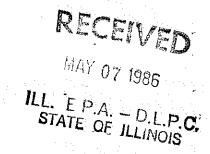
Mr. Dave Dorey Handschy Industries 13601 South Ashland Riverdale, Illinois 60627

Mr. Dorey,

GULF COAST LABORATORIES, INC.

2417 Bond St., Park Forest South, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7533



Please find enclosed a description of the sampling procedures employed at the waste pit at your facilities on 10/29/85 and 11/25/85.

The sampling was accomplished with a device similiar to the Coliwasa Sampler described in SW-846 2nd edition, "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" Section 1.2.1.1. and following the procedure outlined in paragraph 3, page 2, Section 1.4.1 Containers, ".... (3) sampling each selected grid point in a vertical manner along the entire length from top to bottom using a sampling device such as a drum thief, or Coliwasa."

The sampling device was of sufficient length to reach to the bottom of the pit and provide a vertical cross section of the pit.

Vertical samples of the pit were taken from the four corners of the pit approximately 3 feet from the corners and/or the edges.

The pit's dimensions are 10 feet by 12 feet by 12 feet. Calculations of the volume of the pit and the amount of material sampled indicates that the composite sample represents approximately 1% of the pit's total volume.

Each of the samples were emptied into a five gallon bucket, where they were mixed throughly and a portion of this taken as a composite of the pit.

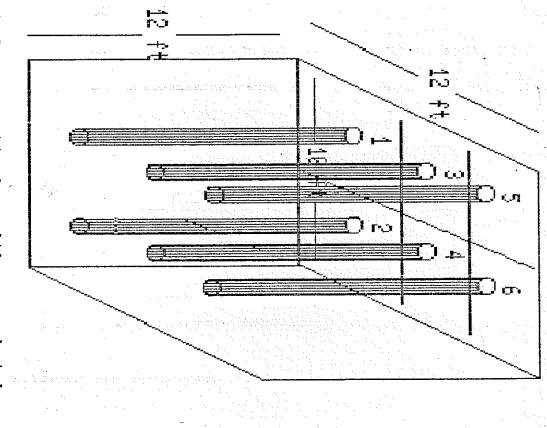
A diagram of the pit and the locations of the samples obtained has also been enclosed with this report.

If you have any further questions please contact our laboratories.

Sincerely, Gulf Coast Laboratories, Inc.

John Boudreau

Laboratory Director



Samples 1 through 6 are vertical profiles sampled from the pit representing approximately 1 % of the Total Volume of the Pit. (Dimensions - 10'x12'x12')



January 28, 1986

Mr. Don Gimble Illinois Environmental Protection Agency 1701 S. First Avenue Maywood, Illinois 60153

Dear Don,

The test we had done by Gulf Coast Labs were all done in the following manner. Sample extraction was taken by U.S.E.P.A., S.W.846, method 1310. E.P. toxicity test for each material was done by the following methods,

- 1) Cadmium, method 7131
- 2) Chormium, method 7190
- 3) Lead, method 7420
- 4) Mercury, method 7470
- 5) Selenium, method 7740
- 6) Silver, method 7760
- 7) Copper, method 7210
- 8) Nickel, method 7520
- 9) Zinc, method 7950

The method used for Reactive Sulficles was 9030, and for Reactive Cyanides, method 9010 was used.

Sincerely,

Handschy Industries Inc.

David W. Dory

Plant Superintendent

RECEIVED

DWD/ns Environmental Protection Agency
Enforcement Section

JAN 3 0 1986

1701 FIRST AVENUE MAYWOOD, ILLINOIS 60153



February 24, 1986

Mr. Cliff Gould
Illinois Enviromental Protection Agency
1701 S. First Ave.
Maywood, Illinois 60153

Dear Mr. Gould:

FEB 25 1986

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

The enclosed letter from Gulf Coast Labs is the procedures used when they test on waste pit water.

I sincerely hope this is the proper information so this matter can be cleared up.

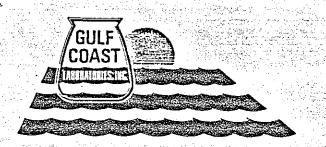
Sincerely,

Handschy Industries, Inc.

David W. Dory

Plant Superintendent

DD/cd Encl.



GULF COAST LABORATORIES, INC.

2417 Bond St., Park Forest South, Illinois 60466

Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

Date: February 18, 1986

Mr. Dave Dorey Handschy Industries 13601 South Ashland Riverdale, Illinois 60627

Mr. Dorey,

Please find enclosed a brief description of the sampling procedures employed at the waste pit at your facilities on 10/29/85 and 11/25/85.

The sampling was accomplished with a device similiar to the Coliwasa Sampler described in SW-846 2nd edition, "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" Section 1.2.1.1.

The device was of sufficient length to reach to the bottom of the pit and provide a vertical cross section of the pit. Vertical samples of the pit were taken from the four corners of the pit and one from the middle of the pit. Each of the samples were emptied into a five gallon bucket, where they were mixed throughly and a portion of this taken as a composite of the pit.

If you have any further questions please contact our laboratories.

Sincerely,

Gulf Coast Laboratories, Inc.

Esulan

John Boudreau

Laboratory Director

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					·
	·				

2 0 APR 1987

Mr. Gary King
Senior Attorney
Enforcement Programs
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Handschy Industries, Inc. ILD 005 104 443

Dear Mr. King:

This letter is in response to your request, dated June 3, 1986, that a Compliance Order be issued to Handschy Industries, Inc., located in Riverdale, Illinois.

We have been carrying out an investigation to determine whether the waste stream generated by Handschy Industries and described as "Pigment water, solvent, non-hazardous bulk liquid F-003" is instead K086, a listed waste. We have obtained inventory lists of raw materials used in Handschy's manufacturing process and, in addition, have had the contents of their waste pit and drains leading thereto sampled and analyzed. All the above-noted materials were reviewed by a printing-ink consulting firm.

As a result of that review it was determined that an attempt to establish that Handschy's waste stream is KO86 would be difficult, time-consuming, and perhaps, not possible. A copy of the consultant's report is enclosed for your information.

We believe that the most efficient way to handle this problem, and to ensure that these wastes are properly disposed of, would be to require Handschy to test for EP toxicity all wastes removed from the pit for disposal. If the wastes are found to be EP toxic, they must be disposed of at a properly permitted hazardous waste disposal facility. We will, in this fashion, protect the environment from improper disposal of a waste stream containing unpermitted levels of lead or chromium.

I therefore recommend that no further attempt be made to re-classify wastes from Handschy's waste water pit. If you have further questions concerning this matter, please please feel free to contact Arlene Kaganove of my staff at (312) 886-4463.

Sincerely yours,

BRIGHAL SIGNED BY MILLIAM E MINO

William E. Muno RCRA Enforcement Section

Enclosure

cc: Glen Savage, EIPA Harry Chappell IEPA

bcc: Mary Murphy, SWB Ron Kolzow, RES

5HE: AKAGANOVE: 6-4463: ea: 3-31-87 ARLENE #1

rev: o.r. 4/15/87

	TYPIST	AUTHOR	OTHER STAFF	UNIT	SECT.	SECT. CAREF	HWEB CHIEF	WMO OIR
INIT. BATE	ED, 4/5/87.	741487	ACC INTERNAL	A/16/87	AP16-87	WEY HIGH		

24755 HIGHPOINT ROAD . CLEVELAND, OHIO 44122 . PHONE: 216 464-3291

December 8, 1986
TET-12-BEGENVEN

DEC 8 - 1986

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION HAZARDRUS WASTE ENFRECEMENT GUARA

U.S. Environmental Protection Agency RCRA Enforcement Office (5HE) 230 South Dearborn Street Chicago, IL 60604

Attention: Ms. Arlene Kaganove

Subject: Candidate Expert Technical Consultant

References: 1. Contract No. 68-01-7331, Subcontract No. TESK-TEAM-012, "Technical Enforcement Support at Hazardous Waste Sites"

2. ICAIR Work Assignment No.: 051447

3. CDM Work Assignment No.: 101

4. Work Assignment Title: Expert Witness/Technical Support for Handschy Industries, Inc. Investigation and Litigation

5. Work Assignment Plan No.: TR-912-3-5

Dear Ms. Kaganove:

In accordance with the Work Assignment (WA) Plan, ICAIR is providing information on one expert technical consultant, with expertise in process chemistry and the production of flexographic inks.

A set of criteria were developed to screen potential candidates for this WA. In addition to knowledge and experience, the expert may be expected to assist the U.S. Environmental Protection Agency (USEPA) and the Department of Justice (DOJ) in trial preparation and serve as a witness in depositions and at trial. Accordingly, candidates must be able to express themselves articulately and be able to present themselves in court, or in other proceedings, in an effective and credible manner. Candidates were also screened for any conflicts of interest that might affect their role as an expert in this particular case. Additionally, previous experience as an expert witness was considered a desirable criteria. The following candidate expert technical consultant meets all of the criteria specified by this WA and has expressed his interest and availability to participate.

ICAIR's analysis indicates that Mr. Gerald Highberger is particularly well qualified to serve as an expert technical consultant in this case. Mr. Highberger is currently President of Weber and Permut, Inc. Weber and Permut, Inc. is a printing ink consulting firm providing in-plant ink operations, ink testing and evaluations, environmental regulatory control assistance, personnel training and research and development services. He has over 16 years of experience in solvent-based inks and coatings. A Summary of Qualifications and Curriculum Vitae are provided.

If you have any questions concerning the enclosures, or if conference calls or face-to-face interviews are desired, please contact me at (216) 464-3291. ICAIR will make all the necessary arrangements.

Very truly yours,

LIFE SYSTEMS, INC.

imothy E. Tyburski

Program/Manage/

TET/sah

Encls.: Candidate Expert Technical Consultant Information (1 copy)

Curriculum Vitae (1 copy)

cc: Task Manager (051447) (w/Encls.)

Program Manager (1447) (w/Encls.)

Contract Administration (1447)



Environmental Protection Agency 1701 First Avenue, Maywood, IL. 60153

312/345-9780

October 9, 1986

Mr. Basil G. Constantelos, Director Waste Management Division U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

RECEIVED

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

RE: Supplemental Request for Compliance Order: Handschy Industries, Inc., Riverdale/Cook, Illinois IEPA File No. 7930HAZ

DLPC No. 0312580003 DLPC No. 0312580003 ILD No. 005104443

Dear Mr. Constantelos:

By correspondence dated June 3, 1986 the IEPA requested a Compliance Order be issued to Handschy Industries, Inc. for violations of RCRA Interim Status Standards relating to generators and storers of hazardous waste. Since that time, the IEPA has conducted another RCRA Inspection on July 18, 1986. This inspection revealed further violations. Copies of this report, a permit applicant submitted by Chem clear, Inc. to the IEPA for treatment of waste generated by Handschy, and consequent IEPA denial of the permit, and correspondence dated September 19, 1986 from the IEPA to Handschy relating to this inspection are enclosed.

We request that you supplement your enforcement action against Handschy Industries, Inc. to seek compliance with these violations now being violated.

Handschy Industries, Inc. October 9, 1986

Page 2

Please inform me of the date your compliance order will be issued and continue to copy me on all documents in this matter.

Thank you for your assistance.

Sincerely,

Donald L. Gimbel Technical Advisor Enforcement Programs

DLG:bh:0282B

cc: Bill Minor, USEPA

Arlene Kaganove, USEPA

Mary Gade, USEPA

Bill Radlinski, IEPA

Gary King, IEPA Regional File Division File

HENRETTA, LAMM & CROSS

ATTORNEYS AT LAW
SUITE 200
10285 YELLOW CIRCLE DRIVE
MINNEAPOLIS, MINNESOTA 55343

ROBERT L. HENRETTA DONALD H. LAMM THOMAS F. CROSS, JR. IVAN M. LEVY BARRY C. ROSENTHAL

Telephone (612) 933-0033

August 22, 1986

VIA FEDERAL EXPRESS

Ms. Arlene Kaganove United States Environmental Protection Agency Region 5 Hazardous Waste Enforcement Branch (5HE-12) 230 South Dearborn Street Chicago, Illinois 60604

RE: Handschy Industries, Inc. (EPA I.D. No. ILD-005-104-443)

Dear Ms. Kaganove:

Enclosed herewith is the Response to Section 3007 Information Request submitted by Handschy Industries, Inc. We appreciate the extension of time EPA granted Handschy to provide this information.

These materials can be used to ascertain the formulas of Handschy's inks. Disclosure of these trade secrets would cause irreparable harm to Handschy's business. Furthermore, all of the substantive criteria for confidential information in 40 CRF 2.208 have been met.

Handschy thus requests that all of the enclosed materials be held confidential by the EPA in accordance with Subpart B of 40 CFR Part 2. In addition, Handschy requests that the looseleaf binder and the materials contained therein be returned to Handschy upon the completion of this EPA investigation.

Very truly yours,

Loan M. Levy

IML/kp

Enclosures

cc: Fred Skimel

RECEIVED

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION UAZARDOUS WASTE ENFORCEMENT DRANG

2 0 AUG 1986

Handschy Industries Incorporated 13601 South Ashland Avenue Riverdale, Illinois 60629

> Re: Letter of Introduction for Versar Inc.

To Whom It May Concern

The purpose of this letter is to introduce Versar Inc., as a contractor to Region V of the United States Environmental Protection Agency (U.S. EPA). Pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, this contractor has been duly designated by the U.S. EPA to conduct a RCRA sampling inspection and request information regarding the hazardous waste management activities at your facility.

You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR 2.203(b). You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim. Information covered by such a claim will be disclosed by U.S. EPA only to the extent, and by the means of the procedures, set forth by 40 CFR Part 2, Subpart B. If-no such claim accompanies the information when it is received by U.S. EPA, it may be made available to the public by U.S. EPA without further notice to you.

Thank you for your cooperation in this inspection. If you have any questions regarding the authority to conduct this inspection please contact Ron Kolzow of my staff at (312) 886-4445.

Sincerely.

Waste Management Division

RC & - 8/11/86 Basil G. Constantelos, Director

cc: Cliff Gould, IEPA -	Maywood	Charles William Control			0	UN 1/3	
Don Gimbel, IEPA -	aywood	OTHER	UNIT	SECT.	SECT.	HWEB	Wash 1
*	TYPIST AUTHO		CHIEF	SEC'Y	CHIEF	CHIEF	MES
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RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES FORM A General Facility Standards

191	TREATMENT, S	REPORT - INTERIM ST TORAGE, AND DISPOSAL General Facility Sta	FACILITIES	
Feneral	<u>Information</u>		rate in March Carlos and March	
		and the contract of the contra	EPA Number:031258000	, 2 ,
			IC Regulated As: GEN. / Tr	
(A) Fo	cility Name: HANO	CHIC CHEMI	CAL CO	
(B) St	reet: <u>/3/0/</u> S	ASHLAND	AIIE	
A CONTRACTOR OF THE CONTRACTOR			: (E) Zip Code: 60.	 /27
			County: Cook	
A PERSONAL PROPERTY OF THE PRO	erator: HANDSCH			·
(I) st	reet: 13/5/ S	ASHLAND.	AUE	
(J) C1	ty: RIVERDALE	(K) State	: (L) Zip Code: 656	27
(M) Pt	ione: 312-597-	7990 (N)	County: Cock	
(0) 0	mer: <u>ST. CLAIR</u>	MANUFACI	ILRING	<u> </u>
	reet: <u>120 - 257</u>			
(Q) Ci	ty: BELLNOOD	(R)_State	: (S) Zip Code: 602	104
(T) Ph	ione: 547-2500	<u>) (U)</u>	County:	<u> </u>
Region:	√ (V) Date of Inspec	tion: 07/18/	86 (W) Time: (From) 9:20 an (To)]]:5.
* . •				
Type of			EW SAMPLING CITIZEN COMPLAI	ТИ
and Same			OTHER PART B	
			(Date of Initial Inspection)	
(X) Wed	ther Conditions: 90°	SUBBIT		
0.55	Coction	Class Class		
Arēc OT/A		1- 11	(AA) Preparer Information	
07/		<u></u>	(AR) Treparer Information	
OTH			Name	
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07/1	.		Chryse and Chrys	
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07/1		<u> </u>	I FPA / EPS I	_
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07/	725.173			
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(Y) Person(s) Interview	ed \	Title	Teleph	one
-DAUE DO	RY	PLANT SUPERINT	TUDENT 312-	597-7990
n en maria de la comitation de la graphique de la comitation de la comitat				
(Z) Inspection Particip	onts	Agency/Title	Teleph	one
GINO BRI	and the second s	IEPA-/EP		345-9780
and the second s				2.1
II. <u>Section A: Scope of Ins</u>	pection.			
1. Interim Status SUBJECT TO 35 E, and G.	s standards for the Ill. Adm. Code 725.	treatment, storage of 101. Complete Inspec	disposal of HA ction Form A, Se	ZARDOUS WASTES ctions B, C, D,
2. Place an "X" i disposal proce only the appli	n the box(es) corresses, and generation and	sponding to the faci n and/or transportat appendixes,	lity's treatment ion activity (if	storage or any). Complete
Permit application proce	ess(es) (EPA Form 35	<u>10-3)</u>	Inspection For	m A section(s)
\$01	storage in contain	ers	. .	I
\$ 202	storage in tanks			J
T01	treatment in tanks			J
SC4	storage in surface	impoundment		K, F
T02	treatment in surfa	ice impoundment	: , <u> </u>	K, F
D83	disposal in surfac	e impoundment		K, F
\$03	storage in Waste p	oile 🗻		L
D81	disposal by land o	application		M, F
D80	disposal in landfi	11		N, F
T03	treatment by incir	neration		0, P
. T04	treatment in device impoundments, or i	ces other than tanks, incinerators	surface	Q
Other <u>Activities</u>				
GENERATOR SENERATOR			APPENDIX	GN
TRANSPORTER			APPENDIX	TR

- 3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 III. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

IL 532-13¹/₃ LPC 19¹ (Rev. 6/85) Pg. 2

		Section B: GENERAL PAGILITY	1 31/1	NUARUS.	. Trait	729 Subpart by
	- مو		YES	NO	NI*	Remarks
		the Regional Administrator notified regarding:				
	à.	Receipt of hazardous waste from a foreign source?	-		4	POSS NOT RECEIVED HAS HAS
	b.	Facility expansion?	· 			NO FACILITY EXPANSION
	C.	Change of owner or operator?	. 		$ \mathcal{L} $	NO CHANGE OF OWNER
2.	Gene	eral Waste Analysis:		ing samulating and the samulatin	M-ka	
	∂.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?				
	b.	Does the owner or operator have a detailed waste analysis plan on file at the facility?		- - <u>√</u>	#	
	c.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				NO WASTE ANALYSIS
						PLAN.
3.	Sec	urity - Do security measures include (if applicable)	2:	•		
	а.	24-Hour surveillance?				
	b.	or i. Artificial or natural barrier around facility?	<u>V</u>			
		<pre>ii. Controlled entry?</pre>	<u>\(\lambda \) \(</u>			
	с.	Danger sign(s) at entrance?	\checkmark	<u></u>		
4,	. 0w	ner or operator inspections:				
	a.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or				
		the environment?	1			WEEKLY
					1	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -

B-1

4/82-A

*Not Inspected

٠.,			STES NO NI NE	and t K S
	b. Does the owner of have an inspection at the facility?	on schedule		
	<pre>c. If so, does the the inspection o items:</pre>	schedule address If the following		
	i . monitoring ϵ	quipment?		NO INSPECTION SCHEDULE.
	ii. safety and e	emergency equipment?		
•	iii. security dev	rices?		
	iv. operating an ment (i.e. o	nd structural equip- likes, pumps, etc.)?	<u> </u>	
	for during	olems to be looked the inspection (e.g. ng, defective pump,		
	vi. inspection the possibl of the equi	frequency (based upon e deterioration rate pment)?		
	d. Are areas subje ed daily when i	ct to spills inspect- n use?		
•	e. Does the owner an inspection l owner or operat	or operator maintain og or summary ofor inspections?	<u></u>	
	f. Does the inspection following information	tion log contain the mation:	en e	
	i. the date ar	d time of the inspection	?	NO INFORCTION
	ii. the name of	the inspector?		
	iii. a notation made?	of the observations	<u> </u>	
·	iv. the date ar repairs or	nd nature of any remedial actions?		
5,	Do personnel training red include:	cords .		
	a. Job titles?			
	b. Job descriptio	ns?	- 1/ -	

	C.	Description of training?	
	d.	Records of training?	
	е.	Did facility personnel receive the required training by 5-19-81?	
	f.	Do new personnel receive required training within six months?	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	
6.	ror	required, are the following special quirements for ignitable, reactive, incompatible wastes addressed?	
	- 5	Special handling?	
	ь.	No smoking signs?	
	С.	Separation and protection from ignition sources?	

1 FG 1/27F					
•	Section C: PREPAREDNESS	<u>ÅND PREVI</u>	ENTION:	(Part 725 Subpart C)	
ų. .	A TO THE REPORT OF THE PARTY OF				
1.	Maintenance and Operation of Facility:	YES	NO NI	Remarks	
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	- <u>/</u>		ONE LEAKING DI LOCATED OUTSIDE	
2.	If required, does the facility have the following equipment:			- WOODEN PALLET.	
	a. Internal communications or alarm systems?	· · · · · · · · · · · · · · · · · · ·	- -		•
•	b. Telephone or 2-way radios at the scene of operations?			N.Y.	••
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u> </u>		oil ny, Booms	
	Indicate the volume of water and/or	r foam ava	ailable fo	r fire control:	
	FIRE SPRINKIEN SYNTEM	150	DOBALA	min.	
	APPROX-73 FIRE FIT	INGULINA	4 xnc		
3.				<u> </u>	
٠	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u></u>			
	b. Is emergency equipment maintained in operable condition?	<u>. Y</u>			•
	Has owner or operator provided immediate access to internal alarms? (if needed)		_ ∠		
;	5. Is there adequate aisle space for unobstructed movement?				
-	6. Has the owner or operator attempt to make arrangements with local authorities in case of an emergen at the facility?				

YES NO NI Remark

- Does the Contingency Plan contain the following information:
 - a. The actions facility personnel must take to comply with \$725.151 and 725.156 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
 - b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §725,137?
 - c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
 - d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
 - e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
 - 2. Are copies of the Contingency Plan available at the site and local emergency organizations?

3. Emergency Coordinator

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?

All the whole the second of the second

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

4. Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 725.156?



NO EMERGENCY SITUATION
HAS OCCURRED

						•
Section E: MANIFEST	SYSTEM,	RECORDKEEPING,	AND REPORTING:	(Part 725	Subpart E	

YES NO NI Remarks

** 1. Use of Manifest System

- a. Does the facility follow the procedures listed in §725,171 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)
- b. Are records of past shipments retained for 3 years?
- ** 2. Does the owner or operator meet requirements regarding manifest discrepancies?
- ** Not applicable to owners or operators
 of on-site facilities that do not
 receive any waste from off-site sources.
 - 3. Operating Record
 - a. Does the owner or operator maintain an operating record as required in 725.178?
 - b. Does the operating record contain the following information:
 - i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?
 - ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)
 - ***iii. A map or diagram of each cell or disposal area

NO OPERATING
RECORD

HAZARDOUS WASTE

. FROM OFF-SITE.

*** only applies to-disposal facilities

E-1.

4/82-A

Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G/H - CLOSURE/POST CLOSURE AND FINANCIAL (Part 725, Subparts G+H)

YES NO	NI	Remarks	Section 1985
있다. 사람이 사람들의 충족 사람들은 그 경우를 가지 않는데 하다.			
1. Closure			
a. Is the facility closure			
plan available for	/		
inspection? $ ilde{V}$			2
b. Has the closure plan been	,		
submitted to the Director? $ extstyle extsty$		· · · · · · · · · · · · · · · · · · ·	<u> </u>
			ingaloga kilida
*2. Post Closure: Is the post closure			
plen available for inspection?	NA	AppliES	ONLU 10
		DISPOSA	L FACILITIES
3. Has the facility prepared a writ-	-	1.5	
ten estimate of the cost of	i galan 1995 Gibbore a di 199	ilian oleh erekan julia di dirikatan di dirikatan di	en e
closing the facility in ac-			
cordance with the closure plan			
as specified in Section 725.212? $\underline{\hspace{2cm}}$	<u> </u>		
	÷		
*4. Has the facility prepared a writ-			
ten estimate of the annual cost			
of post-closure monitoring and	N/a	, i	ہے۔ کا کا مسا طیائی
maintenance of the facility?	1/1	Hope lies	ONLY TO
		DISPOSA.	L FACILITIE
	-		

^{*} Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 725, Subpart I)

··		YES NO NI	Remarks
1.	Are containers in good condition?.		SOME DRUMS WERE DENTED AND RUSTY.
2.	Are containers compatible with waste in them?	<u> </u>	ONE DRUM WAS LEAKING
3.	Are containers managed to prevent leaks?		
4.	Are containers stored closed?		DNE DRUM STORES
5.	Are containers inspected weekly for leaks and defects.		
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<u> </u>	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 35 Ill. Adm. Code 725.117(b) apply).		
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u> </u>	
•			

	Section J - TANKS (Part 725, Subpart J)
	YES NO NI Remarks
1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?
3.	Do continuous feed systems have a waste-feed cutoff? Not a continuous FEED System-
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before? **HASANDER'S WATE STANKE STANKES AND STANKES
*5.	Are required daily and weekly inspections done?
6.	Are reactive & ignitable wastes in tanks protected or rendered non- reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) WASTE IS AND IENITA OR KENCTIVE
7.	
8.	HAZAROZUI DAVIZ UNZZ
	Tank capacity: gallons Tank diameter: feet N/N WASTE IS NOT Distance of tank from property line feet
	(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section	Λ.	Scope
コピクトコロロ	//	. 3 COP6

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B:	MANIFEST	REQUIREMENTS	(Part 722	, Subpart	B)

shipments during that period were Numerous.

(1)	Does the operator have copies of the manifest available for review?	
(2)	Manifests for shipments in past 3/ months were examined. The approx. number of manifests	

YES NO

NI

Remarks

- (3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).
 - a. Manifest document number?
 - b. Name, mailing address, telephone number, and EPA ID number of Generator
 - c. Name and EPA ID Number of Transporter(s)?
 - d. Name, address, and EPA IDNumber Designated permitted- facility and alternate facility?
 - e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?
 - f. The total quantity of waste(s) and the type and number of containers loaded?
 - g. Required certification?
 - h. Required signatures?
 - (4) . Reportable exceptions
 - a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. Accept 15
 - b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (35 III. Adm. Code 722.142) to the Regional Adminitrator.

Sect	ion C: PRE-TRANSPORT REQUIREMENTS (Par	t /22, subpa	u c c j			•
		YES	ОИ	NI	REMARKS	
	Is wastepackaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)					
2.	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site)					
3.	If required, are placards available to transporters, of hazardous waste?	<u>/</u>				·
4. ·	On-site accumulation of generated waste generates either (A) in its storage factill. Adm. Code 722.134 [See 725.101(c)) tanks and containers. If the installation electron D. If the installation electron D.	cility [725. (7)]. Optio tion elects	lOl(b)] or n B restri option A.	(B) in accts all acccheck this the follo	cordance wit cumulation t box ar	tn 35 to nd ski
	a. Is each container clearly marked with the start of accumulation date?			· · · · · · · · · · · · · · · · · · ·	<u> M/A</u>	· · · · · · · · · · · · · · · · · · ·
	b. Have more than 90 days elapsed since the date inspected in (a)?					<u> </u>
:	c. Do wastes remain in accumulation tanks for more than 90 days?		:	\		
	d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	**************************************				
Sect	tion D: - RECORDKEEPING AND REPORTING	(Part 722, S	Subpart D)			•
		YES	NO	NI	REMARKS	
. 1.	Are all tests results and analyses needed for hazardous waste determinations retained for at least three years?	<u> </u>	, 			
Sec	tion E: INTERNATIONAL SHIPMENTS (Part	722, Subpart	: E)	~ ; · · · · ·		
٦.	Has the installation imported or exported Hazardous Waste?		V			·
	(If answered Yes, complete the followi as applicable).	ng			: -	*.
	a. Exporting Hazardous Waste; has a generator:					

	· •	JE2 MO	N I	Remarks	
i. Notified the Administra writing?	itor in		WA	DOES NOT EXPORT	
<pre>ii. Obtained the signat foreign consignee of delivery of the was the foreign country</pre>	confiming 🥄 ste(s) in				
iii. Met the Manifest r					
Importing Hazardous Wast the generator met the ma requirements?	e; has nifest			DRES NOT IMPORTANT HAZARDOUN WASTE	

HANOSCHY CHEMICAL COMPANY MANUFACTURES PAINT
VEHICLES AND FINISHED FLEXOGRAPHIC TUKS HANDSCHE
GENERATES TWO HAZARDOUS WASTE STREAMS: 1) SOLVENT
CLEANING WANTE FOOS/FOOS Which is STORED IN 55 CM
DRUME THE DAMES ARE STORED INSIDE THE BUILDING
AND CUTSIDE THERE ARE APPROXIMATELY 415 FIFTY- FIVE
CALLOW DRUME OF FOOS/FOOS STONED AT THE SITE.
DUE PRUM WAS LEAKING, ANOTHER DRUM WAS STORED
OPEN. THE MATRETTY OF THE DRIVEN HAD HAZAROGUS WAST
LABELY WITHOUT ACCUMULATION DATES AND WITHOUT
HAZARDOUN WANTE NUMBERS. 2) WASH WATER KOSO TORED IN
55 GALLOW DRIEMS, TANKER TRUCK, AND IN THE GOOD GALLON
STORAGE TANKS. THE TANKS ARE DEEN, IN-GROUND CONCRET
TANKS. THERE ARE Approximately 16-55 GALLOW PRIME
OF WARA WATER (KOSE) STORED AT THE SITE.
THE FOLLOWING ARE VIOLATIONS OBSERVED DURING THIS
INSPECTION: 1) 703-150 - A PART A WAS NOT SUBMITTED
THINTY DAYS AFTER THE DATE THE OWNER OR GERRATOR FIRST
BECOMES SUBJECT TO THE STANDARDS IN 35 ILL Adm CODE 735
2) 725, 113 - NO WANTE ANALYSIS PLAN
3) 725 115- NO INSPECTION SCHEOULE. DID NOT
TOKE REMEDIAL ACTION CONCERNING THE LEAKING 55 GALLO
DRUM OF SOLVENT CLEANING WASTE FROS/FOOS. NO
INSOECTION LOG
4) 725 1/6 - NO GERSONNEL TANDING PROBRAM
NO PERSONNEL. TRAINING RECORDS.
5) 735 131- FOCILITY DIO DOT MAINTAIN THE

NARRATIVE	
HAZARDOUS WASTE STORAGE AREA (FOO3/FOOS) FOR I	7)=
UNPLANATO RELIEVE OF HAZARDOUS WASTE.	•,
6) 725,132 - FACILITY IN NOT EQUIPPED WITH	INTERNAL
COMPUNICATIONS OR ALARM SYSTEMS.	
7) 725 134 - NO IMMEDIATE ACCESS TO INTERN	102
ALARMS OR EMERGENCY COMMUNICATION DEVICES LOCATED	, NEAR
HAZARDOUS STORAGE AREAS.	·.
8) 725.135 - ADEQUATE AISLE SONCE WAS NO	<u> </u>
MAINTAINED AT THE FOOSIFOOS DRUM STORAGE ARE	
9) 725. 137 - NO BITTEMPT WAS PROF TO FAIR	niLinkizE
LOCAL POLICE, FIRE DEPORTMENTS, EMERGENCY RESPONSE TO	AMS DIE
HONGITALS WITH THE HAZAROBUS AGRECTS OF THE FAC	UKI TJE
10) 725.15) - NO CONTINGENCY PLAN	
11) 725. 173- NO POERATING RECORD	
12) 725.125 - NO FACILITY ANNUAL REPORT	
13) 725-212 - NO CLOSURE PLAN	
14) 735.242 - NO CLOSURE COST ESTIMATE FO	s_Clarina
THE MAZARDOUS STORAGE AREAS.	
15) 722.142 - EXCEPTION REPORTS HAVE NOT BE	
SUBMITTED TO THE DIRECTOR FOR MANIFESTS # 122	
# 1223684 - 1/31/85, # 1223686 - 3/12/85, # 1223700 - 3	_ ·
# 1303052 - 3/22/85, # 1303017 - 4/24/85, # 1303068-51	
# 1303069-6/20185, # 1303074-6/20185, # 1303070-8/3	
# 1303073-8/9/PS, # 1303084-9/20/PS, #1303085-10/	11/85, 1
#1427379-10/30/85, AND # 1223670-12/26/84.	
- 16) 725.274. CONTAINFANT AND NOT INSPECTED WE	EKY
17) 725.271. CONTRINER LEAKING	:
18) 725.273 CONTAINER STORED DOEN	o TANKS
30) 725. 294 REDUINES INSPECTIONS NOT RENK NONE	

NARRATIVE

FACILITY SHOULD FILE	<u>A SUBSEQUE</u>	ENT NOTIFIC	ATION TO
OMIT KO78, KO79, KO80, KO80	2, Ulaa, Ulgo, Uá) 33, UI/2, U/54,	AND UZBO.
INCLUDE KOPE AND FOO3/FO	05. FACILITY &	Hourn ALSO	CHANGE
HAZARDOUS WASTE ACTION	Control of the contro	Concerns to a programmed to the contract of the contract of	Alaine - Total
UIC.			
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Facility Jame: Monselly CHEMICAL Company USEPA #: TLOODS104443 IEPA #: 03/258,003

Waste Name	Generating Process (For waste gen. on	Date of Last	USEPA Haz	0n 8700	On 3510				Amount On	Rate of Gener-	Last Mani-	Dispsition (By Proc-
	site. N/A for TSD)			-12	-3 *	8 <u>3</u> °	8.4/	8 <u>%</u>	Site	ation		ess Code)
WASH WATER	WATER WASH FOR	6-4-86	K086	NO	NO	Nb	NÓ	Nö	148809A1	WWGUXUN	4-20-85	081
SOLVENT CLEWING WASTE	Equipment working.		F003-	NO	No	No	NO	No	ARCHOS 415-55 GAI DAUMS	3035 pson Per WK.	7-14-86	
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^{*} All "no" responses must be explained in the narrative

Statutory authority for this request for information can be found at Section 3007(a) of the Resource Eenservation and Decorary Act, 42 U.S.C. 96927(a). The information requested herein must so resided notwithstanding its possible characterization as confidential importation or trade secrets. You are a 101 0 7 1986 part a claim of coefficientiality pursuant to 40 CFR 2.203(b) for any remnerion produced that, it disclosed to persons other than of HE-12s, employees, or duly authorized representatives of the inited states, would divulge information entitled to actection as trade species. Are information which the Administrator of the U.S. EPA determines to constitute methods, processes or other business information entitled to protection as trade species. RETURNORECEIPT REQUESTED to confidential surgains to the procedural set forth in information is provided since any information not so insertion will not be accorded this protection by the U.S. EPA.

C.T. Corporation

Registered Agent form submitted pursuant to this request must be meanized and dandschy Industries, Incorporated sure centrying that a contained 20% S. LaSalle St. and accurate to the best of the signatory knowledge and beautiful and the request information that any portion of this submike: Section 3007 Information Request misleading, the signatory should so making the Handschy Industries, Incorporated submitted under this information request to 13601 S. Ashland Avenue the signatory can be prosecuted under Section Riverdale, Illinois 60627 States Code.

EPA I.D. No. ILD 005 104 443

To know It May Concern: the herein must be provided in the following receipt of this remest to the brief states in the following receipt of this remest to the brief states in the resource conservation and Recovery Act (RCRA). Therefore, in order to determine whether the above facility is a regulated RCRA facility, you are requested to supply the following information:

- Sinc (1) y An inventory of all raw materials currently used for the production of paint vehicles and flexographic inks at the Riverdale facility;
- Basil(2). A list of raw materials used after November 19, 1980, for Waste Manthe production of paint vehicles and flexographic inks at the Riverdale facility;
- (3) Names and addresses of all suppliers of raw materials for the production of paint vehicles and flexographic inks at the Riverdale facility;
 - (4) Copies of the Material Safety Data Sheets (MSDS) for all raw materials used for the production of paint vehicles and flexographic inks at the Riverdale facility; and

(5) The date when the outdoor, in-ground concrete tank (waste-									
	KARANOVE 6-	Was 1851	cleane	George Cast		ование		WEDN-A.	
	TYPIST	AUTHER	STAFF	CLEE	207	Date		1499	
IN B	M. 6/30/86.	14 13018b				WEM	4286	11/11/	

Statutory authority for this request for information can be found at Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. §6927(a). The information requested herein must be provided notwithstanding its poseible characterization as confidential information or trade secrets. You are entitled to assert a claim of confidentiality pursuant to 40 CFR 2.203(b) for any information produced that, if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would which the Administrator of the U.S. EPA determines to constitute methods, prowill be maintained as confidential pursuant to the procedures set forth in information is provided since any information not so identified will not be accorded this protection by the U.S. EPA.

The written statement submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. Should the signatory find at any time after submittal of the requested information that any portion of this submittal certified as true is false or misleading, the signatory should so notify the U.S. EPA. If any information the signatory can be prosecuted under Section 1001 of Title 18 of the United States Code.

The information requested herein must be provided within 25 working days following receipt of this request to the United States Environmental Protection Agency, Attn: Arlene Kayanove, Region V, Hazardous Waste Enforcement Branch (5HE-12), 230 South Dearborn Street, Chicago, Illinois 60604.

Please contact Hs. Kaganove, at (312) 886-4463, if you have any questions regarding this request for information.

Sincerely, production of paint vehicles and flagographic into at the Riverdale facility:

sove facility is a required RCBA facility, 970 m

Basil G. Constantelos, Ofrector III vehicles and Flamprephic IIII Haste Management Division 1821

cc: Gary King, IEPA-Enforcement, Springfield
Donald Gimbel, IEPA, Maywood
Mark Haney, IEPA-Compliance Monitoring Section, Springfield

(4) Copies of the Haterial Safety Data Sheets (1885) for all reenterials used for the production of paint wanicles and flexographic inks at the Miverdale facility; and

(5) The date when the outdoor, in-ground concrete task (whotewater pit) was last cleaned.

ank 5HE-12: AKAMANOVE 6-4 463-:0. OTHER 6/ SIMID isk SETT. K gamove 牌的 TYPIST AUTHOR STAFF CHEF SEC'Y CHIF EMF WEM INT. 6/30/86 2-1-86 16/30/86 MIE

3	SENDER: Complete items 1, 2, 3 and 4.
Form 3811, July 1982 447-845	Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.
982 447-8	Show to whom, date and address of delivery. Restricted Delivery.
क्र	3. Article Addressed to: C. T. Corporation Registered agent for Handschy Industries, Incorporated 208 S. La Salle St. Incarro, Il 60604
	4. Type of Service: Article Number Registered Insured Certified COD Express Mail
	Always obtain signature of addressee or agent and DATE DELIVERED.
DOME	5. Signature – Addressee X CT Corporation System
STIC	6. Signature O Agent La Salle Street X Chicago, Illinois 60604
STUS.	7. Date of Delivery 7/10/86
DOMESTIC RETURN RECEI	8. Addressee's Address (ONLY if requested and fee paid)

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.

Complete items 1, 4, 5, and 4 on the reverse.

Attach to front of article if space permits, otherwise affix to back of article.

Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE USE \$300

RETURN TO



(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

(City, State, and ZIP Code)

EPU#1



Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

217/782-5544

June 3, 1986



WASTE JANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Mr. Basil G. Constantelos, Director Waste Management Division U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

RE: Request for Compliance Order: Handschy Industries, Inc., Riverdale/Cook, Illinois IEPA File No. 7930HAZ DLPC No. 0312580003 ILD No. 005104443

Dear Mr. Constantelos:

This Agency hereby requests that a Compliance Order be issued to the above facility for violations of RCRA Interim Status Standards pertaining to generators of hazardous waste storage.

Handschy Industries, Inc. is regulated both as a generator of hazardous wastes and as the owner and operator of a hazardous waste storage facility. A description of the facility and the regulations of which it is not in compliance are contained in the attachment to this letter. Also enclosed with this letter is the Agency file relating to this matter.

The Illinois EPA staff attorney assigned to this matter is Mr. Donald Gimbel. Mr. Gimbel's address is Illinois Environmental Protection Agency, 1701 South First Avenue, Suite 600, Maywood, Illinois 60153, (312) 345-9780. Please inform him of the date on which the Compliance Order is issued and please copy him on all documents in this matter. Also, please advise him of the name of the attorney with your Agency who will be assigned this Compliance Order.

Page 2

Thank you for your assistance in this matter.

Sincerely,

Gary King

Senior Technical Advisor

Division of Land Pollution Control

GK/DG/kes/0238K

Enclosures

cc: Bill Miner, USEPA Mary Gade, USEPA Bill Radlinski, IEPA Don Gimbel, IEPA Regional File

Division File



312/345-9780

CERTIFIED MAIL
Return Receipt #P 596 610 813

CERTIFIED MAIL
Return Receipt #P 596 610 775

Refer to: 0312580003 - Cook County - Riverdale/Handschey ILD 005104443

0316000028 - Cook County - Chicago/Land and Lakes #2

PRE-ENFORCEMENT CONFERENCE LETTER

April 17, 1985

Mr. David Dory
Plant Superintendent
Handschy Industries, Inc.
13601 South Ashland Avenue
Riverdale, Illimois 60627

Mr. James Cowhey
President
Land and Lakes Company
123 North Northwest Highway
Park Ridge, Illinois 60068

Gentlemen:

During an interim status standards inspection conducted at Handschy Industries on April 3, 1985, several apparent violations of the Illinois Environmental Protection Act and/or Rules and Regulations adopted thereunder were noted. These apparent violations are set forth in Attachment A to this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of the Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at 1701 South First Avenue, Suite 600, Maywood, Illinois 60153. The purpose of this Conference will be:

- 1. To discuss the validity of the apparent violations noted by Agency staff, and
- 2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for April 23, 1985, at 10:00 A.M. If this arrangement is inconvenient, please contact Don Gimbel at 312/345-9780 to arrange for an alternative date and time.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely,

Finner P. Burg

Kenneth P. Bechely, Northern Region Manger Field Operations Section Division of Land Pollution Control

KPB:BLE:gec/Doc.#0177A

Attachment

cc: Division File (2) Northern Region (2)

Don Gimbel

ATTACHMENT A

The following Apparent Violations refer to Riverdale/Handschy:

- Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a 1. solid waste must determine if that waste is a hazardous waste using procedures decribed in this section. You are in apparent violation of 35 Ill. Adm. Code 722.111 for the following reason: the procedures for determining whether a solid waste is a hazardous waste were not followed for the waste stream identified as "pigment, solvent, water". Said waste stream meets the definition for the listed hazardous waste K086: solvent washes and sludges, caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps and stabilizers containing chromium and lead. This determination is based on the following: this waste stream results from cleaning the tubs and other equipment used in your water based ink manufacturing area, using water, caustic, and/or alkaline cleaners. The waste's analysis indicates the presence of chromium and lead.
- 2. Pursuant to 35 Ill. Adm. Code 722.112, a generator must not offer his bazardous waste to transporters or to treatment, storage or disposal facilities that have not received an EPA identification number. You are in apparent violation of 35 Ill. Adm. Code 722.112 for the following reason: the above identified hazardous waste stream has been sent for disposal at a disposal facility (ie. Land and Lakes sites nos. 1 and 2 in Chicago) which does not have a USEPA Identification Number.
- Pursuant to 35 Ill. Adm. Code 721.107 concerning residues of 3. hazardous waste in empty containers, no more than 2.5 antimeters. (one inch) of residue may remain on the bottom of the container. If there is more, the container and residue are subject to regulation under Parts 721 through 725. Among other things, the containers and residue can only be sent to a permitted hazardous waste facility and must be accompanied by a manifest, and hauled by a permitted transporter. You are in apparent violation of 35 Ill. Adm. Code 721.107 for the following reason: drums containg spent solvent/mill wash are removed off-site by a drum reclaimer. They are not checked prior to removal to ensure they are empty as prescribed by the Regulations. It was noted during the April 3rd inspection that drums were returned to Handschy by the reclaimer because the volume of waste in them exceeded the prescribed limit.

- 4. Pursuant to 35 Ill. Adm. Code 722.121, a generator must prepare a manifest to accompany each load of waste going off-site, containing the information outlined in this Section. Your are in apparent violation for the following reason: manifests accompanying the "pigment, solvent, water" waste stream were not properly completed in that they did not contain the proper DOT shipping description nor the EPA identification numbers of the generator, transporter, nor disignated facility.
- 5. Pursuant to 35 Ill. Adm. Code 809.501, manifests prepared by the generator shall contain, among other things, the name of the special waste. You are in apparent violation for the following reason: manifests accompanying the drums of spent solvent/mill wash should include the designation K086.

The following Apparent Violations refer to Chicago/Land and Lakes Nos. 1 and 2:

Pursuant to the Illinois Environmental Protection Act, Section L. 21(f), no person shall conduct any hazardous waste disposal operation without a RCRA permit for the site, in violation of any regulations adopted by the Board under this Act, in violation of any RCRA permit filing requirement, or in violation of any order adopted by the Board. You are in apparent violation of Section 21(f) of the Illinois Environmental Protection Act for the following reasons: the Land and Lakes sites numbers 1 and 2, in Chicago, accepted for disposal approximately 120,000 gallons in 1983 and approximately 108,000 gallons in 1984 of the hazardous waste stream described in number 1 above from Handschy Industries. Said sites are not RCRA permitted for the acceptance and disposal of hazardous wastes. Said sites are also not in compliance with Section 703.150, requiring the submittal of Part A of the permit application to the Agency within thirty days after the date the facility first becomes subject to the standards set forth in Section 725, the standards applicable to owners or operators of hazardous waste treatment, storage, disposal facilities.

FOLLOW-UP INSPECTION

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS Form B Generator Inspection* (35 Ill. Adm. Code 722)

I. General Information:*

(A)	Installation Name: HANDS	SCHY INDUSTRIES	SIK.
(B)	Street: 13601 S. ASHL	AND AVE.	
(C)	City: RIVERDALE	(D) State:	(E) Zip Code: 60629
(F)	Phone: 312-597-7990	(G) County: <u>COOK</u>	· · · · · · · · · · · · · · · · · · ·
(H)	Date of Inspection: 413185	Time of Inspection	(From) <u>9:00A</u> (To)
(I)	Weather Conditions:	•	
	m * 1		
*	1		Me Me
(J)	Person(s) interviewed	Title	Telephone
	DAVE DORY	PLANT SUPER INTER	JOENT - Same -
	ANTONIA MARKALLE - MARKELLE L. COM	www.commens.com	
(K)	Inspection Participants	Agency/Title	Telephone
	J+L	* *	
		*	A) X
(L)	Preparer Information		
(-)	Treparer anyonmustra		
	- Name	Agency/Title	Talanhana
			Telephone
	BONNIE ELEDER	IEPA 169 SII	312-345-9780

*Do <u>not</u> use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO:	DATE: 4/3/85
OM:	Information only
SUBJECT:	Response requested
This inspection was done as a followup to the previous follo	wup inspection
of 10-23-84 and subsequent pre-enforcement compliance confer The following items were inspected:	ence of 12-4-54.
1) drums stored closed and properly labeled and marked, wee	kly inspections
performed - Drums of spent solvent and paint sludge were sto	red in two areas
They were first prepared for storage inside the warehouse, i	e. marked
and labeled. Eleven drums were counted inside which most we	re properly mark
and labeled (not all of the labels were accessible). They h	ad accumulation
dates of $3-27-85$, $3-28-85$ and $4-1-85$. There were also 2 dru	ms without label
D. Dory wasn't sure of what was inside of them. Plus were the	ere were approx-
imately two dozen "empties" inside the warehouse. D. Dory e	mplained that
the paint sludges settle to the bottom of the drums. When t	the solvent is
numbed out by the transporter (Mr. Frank) the sludges are th	ien cleaned out
either through dimution with additional spent solvent or by	paysically.
digging out the sludge. The cmpties are then sent to a dru	in recrarier.
orums of spent solvent are also stored outside.un Thirty-for counted of which all were closed, non-leaking and dated range	ing haiwaau
2-18-85 and 4-1-85. "Empties" were also stored outside, sep	ATEL TO
They were also closed. Several were randomly chosen and tip	oned slightly
- in order to determine if any sludge remained inside of them.	<u> </u>
"heavy". When questioned as towhether the reclaimer or Hand	lschy checked
each drum prior to removal by the reclaimer for less than th	re one include
residue, D. Dory said that the drums were not openned and the	at the reclaimer
- simply would not accept any that felt heavy. He wiso said t	natta last
time the reclaimer was out he returned several drums because	too much
studee remained inside of them. Also, the drum inspection i	secords were -
* inspected. Weekly inspections are done and documented. Thi	ls also includes
- an inventory and dates when shipped out.	
2) manifests - Those for about the past year were viewed.	On the average
- it appears that a load of spent solvent is shipped out about	= avary two
weeks. No problems noted with these manifests.	No.
	agustie was bus
4) The other non-hazardous wastes generated were discussed alkaline cleaners and scrubber water: All go into a tank -	restrolize age
other - pumped out and sent to Land and Lakes for disposal	(138th Street
sites). But while reviewing the manifests, these manifests	were also
viewed and a question arised in that this waste, described :	as "pigment.
solvent, vater, non-hazardous bulk liquid" was also describe	ed as FOO3.
When questioned, D. Dory felt that the addition of the 1003	was a mistake
because all of the spent solvent goes into the drums - none	into the tank.
(This permit, go. 821401, was further checked into 0 sec fol.	lowing memo.)
In conclusion, the following apparent violations were noted:	"Empty" druma
not always checked to see if empty according the Section /2	1.10/b; arumu
with waste removed by reclaimer and resurned to Handschy due	e to amount of
. waste no manifests, no licensed hauler, non-permitted fa	cility.
	The state of the s

Ninois Environmental Protection Agency



312/345-9780

1701 S. 1st St. Maywood, III, 60153

CERTIFIED MAIL
Receipt #P 205 497 605

Refer to: 03125803 - Cook County - Riverdale/Handschy Industries ILD 005104443

November 21, 1984

Mr. Don Czynik Handschy Industries 13601 South Ashland Avenue Riverdale, Illinois 60629

Dear Mr. Czynik:

The Agency has previously informed you of apparent noncompliance with the requirements of 35 Ill. Adm. Code 720 - 725. These apparent violations are set forth in Attachment A to this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will in turn refer this matter to the Attorney General's Office for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at this office. The purpose of the Conference will-be:—1)-to-discuss the validity-of—the above apparent violations, and 2) to arrive at a program to eliminate existing and/or future violations. You should, therefore, bring such personnel and records to the Conference as will enable complete discussion of the above items.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Act prior to the filing of a formal complaint. This section requires the Agency to inform you of the charges which are to be alleged, and offer you the opportunity to meet with appropriate Agency officials within 30 days of this notice date in an effort to resolve such conflicts which could lead to the filing of a formal complaint.

Please contact Doanld L. Gimbel of the Agency's legal staff at the above number within seven (7) days if you wish to schedule such a meeting or at any time you have any questions regarding this matter.

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rende sakepadije kralej prode agadijer i ističke pod 19. septem data zapadina paparije i i i i i i i i i i i i

Sincerely,

Thumand P. Bergs

Mr. Kenneth P. Bechely, Northern Region Manager Field Operations Section Division of Land Pollution Control

KPB:BLE:qec

Attachment A

cc: Division File Northern Region

Don Gimbel - Enforcement

ATTACHMENT A

Apparent Violations of 35 Ill. Adm. Code 720 - 725

- 1. Pursuant to Subpart I of 35 Ill. Adm. Code 725, facilities that store containers of hazardous waste must use nonleaking containers in good condition and containers that are compatible with the wastes in them. The containers must be stored closed and handled so as to not cause ruptures or leaks. Containers must be inspected at least weekly. Containers holding ignitable or reactive waste must be at least 50 feet from the facility property line. You are in apparent violation of Subpart I of 35 Ill. Adm. Code 725 for the following reasons: not all of the containers were not stored closed, nor were being inspected weekly.
- 2. Pursuant to 35 Ill. Adm. Code 722.134, an owner/operator may accumulate hazardous waste on-site without a permit for 90 days or less, provided that (among other requirements) the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. At the time of the inspection, the date of accumulation was not on many of the drums, or it was not visible for inspection due to the placement of the drums.

BLE:gec



December 7, 1984

Illinois Environmental Protection Agency 1701 S. First Ave. Maywood, Il 60153

Atten: Miss Bonnie L. Eleder

Dear Miss Eleder,

As per our meeting on December 4, 1984, this letter will be a confirmation on the points discussed:

- 1.) Weekly drum inspection log has been re-implimented under present management as of October 24, 1984.
- 2.) An employee will be assigned to open and remove only those bungs on drums needed for the waste hauler to vacuum up.
- Reorganizing newly generated waste drums in compliance with regulations about facility property lines.
- 4.) Proper information on waste label compliance as well as new staying procedures for generated waste should insure constant rotation of waste removal.
- Still pursuing other sources of waste removal in order to stay in compliance.

Sincerely,

HANDSCHY INDUSTRIES

Donald Czyznik Plant Superintendent

Dnald S Crypnk

itendent word with

DC/cm

Mr. Gary King
Senior Attorney
Enforcement Programs
Thirnois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Handschy Industries, Inc. ILD 005 104 443

Dear Mr. King:

This letter is in response to your request, dated June 3, 1986, that a Compliance Order be issued to Handschy Industries, Inc., located in Riverdale, Illinois.

We have been carrying out an investigation to determine whether the waste stream generated by Handschy Industries and described as "Pigment water, solvent, non-hazardous bulk liquid F-003" is instead K086, a listed waste. We have obtained inventory lists of raw materials used in Handschy's manufacturing process and, in addition, have had the contents of their waste pit and drains leading thereto sampled and analyzed. All the above-noted materials were reviewed by a printing-ink consulting firm.

As a result of that review it was determined that an attempt to establish that Handschy's waste stream is KO86 would be difficult, time-consuming, and perhaps, not possible. A copy of the consultant's report is enclosed for your information.

We believe that the most efficient way to handle this problem, and to ensure that these wastes are properly disposed of, would be to require Handschy to test for EP toxicity all wastes removed from the pit for disposal. If the wastes are found to be EP toxic, they must be disposed of at a properly permitted hazardous waste disposal facility. We will, in this fashion, protect the environment from improper disposal of a waste stream containing unpermitted levels of lead or chromium.

I therefore recommend that no further attempt be made to re-classify wastes from Handschy's waste water pit. If you have further questions concerning this matter, please please feel free to contact Arlene Kaganove of my staff at (312) 886-4463.

Sincerely yours,

MITTON E MONO OCCUPAT ZICHED BA

William E. Muno RCRA Enforcement Section

Enclosure

cc: Glen Savage, EIPA Harry Chappell IEPA

bcc: Mary Murphy, SWB Ron Kolzow, RES

5HE:AKAGANOVE:6-4463:ea:3-31-87 ARLENE #1 rev: o.r. 4/15/87



Environmental Protection Agency 1701 First Avenue, Maywood, IL. 60153

312/345-9780

CERTIFIED MAIL
Return Receipt # P 272 959 950

Refer to: 03125803 - Cook County - Riverdale/Handschy Industries ILD 005104443

August 20, 1984

Mr. Frank Butler Handschy Industries, Incorporated 13601 South Ashland Avenue Riverdale, Illinois 60629

Dear Mr. Butler:

A December 15, 1983 inspection of your site revealed apparent violations of the Illinois Environmental Protection Act and/or violations of the Rules and Regulations of the Illinois Pollution Control Board. The apparent violations noted in that inspection were described in a letter to you on March 15, 1984. A copy of that letter is enclosed. On March 27, 1984 you responded to the above letter outlining the actions you would take to correct the apparent violations.

Please submit, in writing, within fifteen (15) calendar days of the date of this letter, two copies of the following documents:

- The most recent training records

- Several randomly selected pages from the drum inspection log

The above documents should be sent to:

Mr. Kenneth P. Bechely, Northern Region Manager Illinois Environmental Protection Agency Division of Land Pollution Control 1701 South First Avenue - Suite 600 Maywood, Illinois 60153

Further, take notice that non-compliance with the Illinois Environmental Protection Act and the Rules and Regulations adopted thereunder may be the subject of an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act, Ch. 111 1/2, Ill. Rev. Stat., Sec. 1001 et seq.

If you have any questions regarding the above, please contact Bonnie Eleder at the above number.

Sincerely,

Finner P. Berg

Kenneth P. Bechely, Northern Region Manager Field Operations Section Division of Land Pollution Control

KPB:BLE:gec

Enclosure: Letter

cc: Division File

Northern Region





September 4, 1984

Illinois Environmental Protection Agency Division of Land Pollution Control 1701 South First Avenue Suite 600 Maywood, Illinois 60153

Attention: Mr. Kenneth P. Bechely Northern Region Manager

Dear Mr. Bechely;

Per you letter of August 20, 1984, I am enclosing copies of our most recent training records and selected pages from the drum inspection log.

If you have any further questions please feel free to call me.

Sincerely,

Frank Butler

Plant Superintendent

FB:cs

RECEIVED

SEP 0 5 1984

STATE OF ILLINOIS



August 24, 1984

I, Frank Butler, acting in the capacity of General Plant Manager, have personally instructed Martin Lentz in the procedures for the handling and disposal of hazardous waste generated by this plant as prescribed by the Illinois Environmental Protection Agency.

Martin has assumed the position of Hazardous Waste Manager and has a full knowledge of the duties and responsibilities associated with that title. He has been instructed in all areas pertaining to the generation, disposal, transportation and proper labeling of all Hazardous Wastes generated at this site.

I feel that Martin is competent to act in the capacity of Hazardous Waste Manager and that his training is sufficient to comply with the requirements of the Illinois Environmental Protection Agency.

Sincerely,

Frank Butler

General Plant Manager

WASTE CONTAINER INSPECTION LOS

Daté	#Drums	Location	Accum. start date of oldest drum	Last Pick-up	Coment	
# -13-84	21	Outside behind storage tanks	4-5-84	3-28-84	16/21 drums not marked w/ accum. start date	ML
h-19-84	33	Outside	4-5-84	3-28-84	l drum w/ open bung	111L
1-27-84	55	Outside	4-5-84	3-28-84	1	ML
r-28-84	116	Outside	4-5-84	3-28-84		ML
»-15 - 84	173	Outside	4-5-84	3-28-84		MX
9-30-84	204	Outside	4-5-84	3-28-84		ML
5-15-84	224	Outside	4-5-84	3-28-84		11.1
5-30-84	104	Outside	5-20-84	6-25-84		ms
-17-84	125	Outside	5-20-84	6-25-84		ML
3-3-84	158	Outside	5-20-84	6-25-84		ML
3-17-84	180	Outside	5-20-84	6-25-84		mz
i - 31−84	205	Outside	5-20-84	6-25-84		1112
				4		

Exhibit 11

Rev. 1-27-81/J.B.

FOLLOW - UP

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS

Form B Generator Inspection*

(40 CFR Part 262)

(35 III. Alm. Code 722)

I. General Information:*

÷ .	Bonnie Electer	IEPAJE		3/2-34	5-9780 sal facility.
	Name	Agency/Title		Telephone	
(L)	Preparer Information				
•					
				:	
(K)	Inspection Participants 5-42	Agency/Ti	le	Teleph	one
		· · · · · · · · · · · · · · · · · · ·			
	mr. with cry thous		gewien.		
(0)	Mr. Don Czyznik		unarintano	Lent 312-	
(J)	Person(s) interviewed	Title		Telepho	
(I)	Weather Conditions:		inng		
				<u>nradav</u>	(1.07 <u>170-00)</u>
(H)	Date of Inspection: 10-23-8	74 Time of	Inspection (From) //:2/02/01	Яо) 121302
	Phone: 3/2-597-7990		and the second second		
	city: <u>Riverdale</u>			1	Code: <u>6062</u>
(B)	Street: 13601 5. ASA	bland Ave		•	
(A)	Installation Name: Hand	tocky Inc	motrie	Inc.	

1.

23



Devesion File DATE: 10-23-84 Information only Response requested this date, a followup ISS, cns done at this facility. The following items covered: drum inspection records; drums closed; drums properly marked + labelled. I met with He first explained that Mr. Butley left in the beginning of Soxtemper & he came on last Monday. He also said that the company had to ben new management & employees & also has plans The next inspection should to a groduction increase. nobably cover all areas of the requirements, as a gesult This inspection indicated the following: O Drums were stored both inside & outside, Those outsid are due for sickup temorrow several rows on an asphalt surface - no pa several use setting in water There were 1/50 drums approx. 14 had no bung I've was off & sitting to solvent ale evident. approx. 46 had accumulation. All were otherwise marked + labelled. unide numbered approx. had viewable labels. doublestacked Only 2/3-12 Of these I had no date of accumulation all that 3) The drum imspector loop drawn up by Mr. Butterwere IL 532-0571 EPA 90A 6/75



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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1 200	· - /
, A	

MEMORANDUM

TO:				DATE	•
. ROM:					Information only
SUBJECT:		· · · · · · · · · · · · · · · · · · ·			Response requested
not used a	fter he lef	7			
(1) It would	,		sloyee	training	Wes
not adequate	~	_	(/	<i>1</i> .	
and athe					
in accordan	ce with y	the ree	ulation	28	
3) manifests	were reve	ewed	All as	peared in	good
noly Shipm	ents have	90 NO	out res	rulasles si	ence the
prestins in		<i>-</i>	- 1	/·	
month.	£.				<u> </u>
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PONGREAGE / HANDSENY

RECEIVED

MAR 2 8 1984

ILL. E.P.A. - D.L.P.C, STATE OF ILLINOIS



March 27, 1984

Mr. Kenneth P. Bechely, Northern Region Manager Illinois Environmental Protection Agency Division of Land Pollution Control Field Operations Section 1701 South First Avenue - Suite 600 Maywood, Illinois 60153

Dear Mr. Bechely,

Your letter on March 15, 1984 regarding the apparent violations of the Illinois Environmental Protection Act and/or violations of the Rules and Regulations of the Illinois Pollution Control Board are valid. The reasons for the violations were confusion and ignorance on my part. With the help of the field inspector and a percise understanding of the rules and regulations regarding Environmental Protection I confidently feel we have rectified the problems. Enclosed please find our contingency plan, and other necessary arrangements. If there are any questions please feel free to call me.

Respectfully,

Frank Butler

Plant Superintendent

Handschy Industries, Inc.

FB:cs

RECEIVED

LNFORCEMENT PROGRAMS

JUN 2 n 1985

Environmental Protection Agency

HANDSCHY INDUSTRIES, INC. FLUID INKS 13601 S. ASHLAND AVENUE RIVERDALE, ILLINOIS 60627 CHGO. 312/468-4900 SUB. 312/597-7990 RECEIVED

MAR 2 3 1984

ILL. E.P.A. - D.L.P.C. STATE OF ILLINOIS



Pursuant to Subpart D of 35 Ellinois Adm. Code 725

Handschy Industries, Inc. Contingency Plan

Persons qualified to act as emergency coordinators:

Handschy Industries, Inc. 13601 S. Ashland Avenue Riverdale, Illinois 60627 312-597-7990 Primary Coordinator:

Frank Butler

Martin Lentz

Non-Responsive

Dave Dory

Non-Responsive

Emergency Equipment:

- 1. Fire Control
 - A. 100 H.P. fire pump with 800-1200 G.P.M. capacity. This is located in the Southeast corner of the plant.

 Freeze-Stat for sprinkler protection.

 Direct wire to Riverdale Fire Department signaling the outbreak of a fire, malfunction of fire pumping equipment, or tampering of valves. Pump and signaling system are independent of plant power system. Fire pump and process pumps are interconnected if the fire pump starts, the pumps moving flammable materials stops.

 See attachment for a schedule of back-up equipment.
 - B. Small or localized fires would be extinguished with hand-held extinguishers located through-out the plant.
 - 1. 5, 10, 15# Dry Chemical or CO_2 .
 - 2. 2-150# Dry Chemical wheeled unites with 50 ft. of hose are on standby.
 - 3. We have a continuing Fire training program through the Riverdale Fire Department.

- 2. Burglar Alarm Direct wire to the Police.
 - A. Perimeter Protection
 - B. Infra-Red heat seekers through-out the plant.
- 3. Emergency lighting system through-out the plant which automatically engages during a power failure.
- 4. Spill Control
 - A. All floor drains empty into our concrete lagoon.
 - B. Tank trucks are on hand to handle potential overflow.
 - C. Local trucking firms are on hand and would be contacted for extra sand and lime when needed.
 - D. Small spills can be controlled with absorbant pillows.
 - E. All valves on flammable solvent lines are Dead-Man type.
 - F. E.S.D.A. will be notified by the Riverdale Fire Department.
 - G. Riverdale Fire Department has their own contingency evacuation plan.
- 5. Local Civil Defense will put their emergency plan into effect when needed.
 - A. Manpower
 - B. Emergency Lights
 - C. Hoses
- 6. The Police will work under the supervision of the Fire Department when needed.
 - A. Crowd and or traffic control.
- 7. Routine inspections of our facility by the State and Riverdale Fire Inspectors have resulted in their understanding the hazardous aspects of the facility.
 - A. What materials we store and where
 - B. The quantity of material
 - C. The floor plan
 - D. Basic process procedure
 - 8. Safety Program
 - A. Spill Control
 - B. Fire Prevention
 - C. First Aid
 - D. Local Hospital has on file a description of the materials used in our plant.

BOX No. (82) 802-remised 1-1-83 Riverdale Αt Ashland & B&O RR DATE: SQD. TRUCKS SPECIAL EQUIP. ALARM **ENGINES** Riv 82, 83 84 85 STILL Riv 81 Dol SH BOX . Har Har Bur Cal C HC SH \mathbb{D} 2nd ALARM EHC, Thor, Glwd, Mar Hwd 3rd ALARM Lan, OF CCH, TP, Flos, Lyn Cal C A ALARM Lan, Hwd COMPANIES TO CHANGE QUARTERS HC Bur XOE Thor Lan 2nd ALARM Lan Flos Ord ALARM Flos

4th ALARM

INFORMATION

Handschy Chemical



Environmental Protection Agency

1701 S. First Street Maywood, LL P. 60153

JUN 20 1985

(312) 345-9780

Environmental Protection Agency

Certified Mail

Refer to: 03125803 - Cook County - Riverdale - Handschy - ILD005104443

March 15, 1984

Mr. Frank Butler Handschy Industries, Inc. 13601 South Ashland Avenue Riverdale, IL 60629

Dear Mr. Butler:

A recent inspection of your site revealed apparent violations of the Illinois Environmental Protection Act and/or violations of the Rules and Regulations of the Illinois Pollution Control Board. The purpose of this letter is to inquire as to your position with respect to the validity of the Agency's findings ald also your plans to correct the apparent violations. For your convenience, we are enclosing with this letter a copy of our most recent inspection report. The apparent violations noted in our inspections are as follows:

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by the facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to Subpart D of 35 III. Adm. Code 725. You are in apparent violation of Subpart D of 35 Ill. Adm. Code 725 for the following reason: no contingency plan was available for review at the time of the inspection.

Pursuant to 35 Ill. Adm. Code 725.137, the owner/operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals as well as state authorities with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation for the following reason: said arrangements have not been made.

Riverdale - Handschy March 15, 1984 Page 2

Pursuant to 35 Ill. Adm. Code 725.116, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to

each such individual. You are in apparent violation of 35 Ill. Adm. Code 725.116 for the following reason: said records were not available for review at the time of the inspection.

Pursuant to Subpart I of 35 Ill. Adm. Code 725, facilities that store containers of hazardous waste must use non-leaking containers in good condition and containers that are compatible with the wastes in them. The containers must be stored closed and handled so as not to cause ruptures or leaks. Containers must be inspected at least weekly. Containers holding ignitable or reactive waste must be at least 50 feet from the facility property line. You are in apparent violation of Subpart I of 35 Ill. Adm. Code 725 for the following reason: the 55 gallon drums containing waste were not stored closed, nor were inspected weekly.

Pursuant to 35 Ill. Adm. Code 722.134, an owner/operator may accumulate hazardous waste on-site without a permit for 90 days of less, provided that (among other requirements) the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container and each container is properly labeled and marked according to 35 Ill. Adm. Code 722.131 and 722.132. At the time of the inspection, the date of accumulation was not on the 55 gallon drums, nor were they properly labeled and marked.

Please submit in writing, within ten (10) days of receipt of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps which have been initiated to prevent any further recurrence of the above-cited violations. This information should be sent to the following:

Mr. Kenneth P. Bechely, Northern Region Manager Illinois Environmental Protection Agency Division of Land Pollution Control Field Operations Section 1701 South First Avenue - Suite 600 Maywood, Illinois 60153

Riverdale - Handschy March !5, 1984 Page 3

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and the Illinois Pollution Control Board's Rules and Regulations may be the subject of enforcement action pursuant to the Illinois Environmental Protection Act, Ill. Rev. Stat. Ch. 111 1/2, Sec. 1001 et seq.

Sincerely,

7- week P. Bully

Kenneth P. Bechely, Northern Region Manager Field Operations Section Division of Land Pollution Control

KPB:BLE:gkw

Enclosure: Inspection Report

Act, Title 35, Ch. 9

CC - Division File Northern Region



Pursuant to 35 ILL. Adm. Code 725.116, we have established and will maintain records pertaining to the training of personnel involved in hazardous waste management.

Pursuant to Subpart I of 35 ILL. Adm. Code 722.131, 722.132, 722.134, 725, the hazardous waste manager will, as one of his responsibilities, begin a weekly inspection of all hazardous waste containers located on this site. This inspection will be made to insure that all containers are closed tightly, properly labeled and marked, free of leaks and that no one container has been on site for more than 90 days from accumulation date.

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS RECEIVED Form B Generator Inspection* (40 CFR Part 262) LNFORCEMENT PROGRAMS

JUN 20 1985

K	<u>1.</u>	General Information:*	
			Environmental Protection Agents
	Installation Name: Hands		
(B)	Street: 13601 5. As,	hland Ave.	
(C)	City: Riverdale	(D) State: <u>IL</u>	(E) Zip Code:
(F)	Phone: 3/2-597-7990	(G) County: <u>Cook</u>	
(H)	Date of Inspection: 12-15-8	3 Time of Inspection (From) 1:30P (To) 3:00P
(1)	Weather Conditions: 305	snowing	
*	Februard	741003	even notanago, said read (2)
(J)	Person(s) interviewed	Title	Telephone
	Frank Butler	Superintendent	312-597-7990
		banniy y	(c) 'On the swaffest faces
		TV To abl	contain the following
(K)	Inspection Participants	Agency/Title	Telephone
*	J+L	V.	[ZInune i g

(L) Preparer Information

Name

Agency/Title

Telephone

B. Eleder

IGPA/GPSI

312-345-9780

^{*}Do <u>not</u> use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

	See "Remorks"		
Communication of the second			
			VIDANO
	warith.		
	v	New Y	
		IFEST REQUIREMENT Ubpart B.)	ITS CONTROL OF THE PROPERTY OF
Does the operator of the manifest a review?		Yes No N	li* Remarks reviewed post 3 years
(If possible, mak	owing information? ke copies of, or on from, manifests		
1. Manifest docu	ument number?	<u>X</u>	
Name, mailing number, and legenerator?	g address, telephone EPA ID number of	<u> X</u>	
3. Name and EPA transporter(ID Number of s)?	<u>X</u>	NOTES OF STREET STREET
Number of de	s, and EPA ID signated permitted alternate facility?	<u>X</u>	
	The second second	en i de la composition della c	a di kacamatan kacam Katamatan kacamatan

(A)

(B)

<i>e</i> r		Yes	No	NI*	Remarks
	5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X		- (1444년) 경원당 후 (1 444 년)	
	6. The total quantity of waste(s) and the type and number of containers loaded?	X		, evinci , silakin ta (eliye -)	
	7. Required certification?	X	·	Mgaler H ala a	
	8. Required signatures?	X	, erija. Julija	ade district. Sa turali es	arek 16. arek 18. ar Antonia eta 18. arek
(C)	Does the owner or operator submit exception reports when needed?		is the The same	<u>X</u>	not needed
	IV. PRE-TRAN	NSPORT	REOU	IREMENT	
-					
(A)	Is waste packaged in accord- ance with DOT regulations? (Required prior to movement of hazardous waste off-site)	, 649.6 	24 - 149 24 (1964) 1 (20) 4 <u>- 1 - 1</u> (waste is pumpedout into taulers truck
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)				
(C)	If required, are placards available to transporter?			X	
(D)	Pre-shipment Accumulation:		vikija:		
	1. Are containers marked with start of accumulation date?	·	. X	gring Pagainag Pagainagan	
-	2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	1941		•	no date of accum.
				ri daya	Victoria de la companya de la compan

	Recor	d the followin	g inform	nation	: /		
-	Tank	capacity?			ga11	ons and the same of the same o	
		diameter?	om prøpe	erty 1	feet	feet	
	(see Comb	tables 2-1 throustible Liquid	ough 2-6 s Code	6 of N - 1977	EPA's "I " to de	lammable and termine compliance)	
		V Training,	Emergen	cy Pro	cedures		
e ero Gelf G			YES	NO	NI*	Remarks	
•	Do Personnel training include: (Effective 5						
	i. Job Titles?		X				
į: n.	2. Job Descriptions?		\times				
 	3. Description of tra	ining?			X.		
	4. Records of training	ıg?			\underline{X} .	on the job train	
	5. Have facility pers received required ing by 5-19-81?					nud to down	rent
	6. Do new personnel required training six months?				<u>X</u>		
	Prepardness and Prever (Part 265, Subpart (P. W. Germania Administrațion Manifestrului (P.C.) Republică A. C. (1988)	
	 Maintenance and Operation 	peration		: 	Beck wit Establish		
	explosion, or	te or hazardou:	•	X	ra regjesa legar Palif	CONTRACTOR OF STATES OF STATES	

2.	If required, does this facility have the following equipment?		
	a. Internal communications or alarm systems?	X	fui olorm (bell) turglar alarm only
	b. Telephone or 2-way Radios at the scene of operations?		<u>telephone</u>
د بيري	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?		absorbent sillous perker infrared heat perker 5, 10, 15 16 dry chemic
			ole for fire control who
	boots, glor goggles	afor	sprinklusystem frie pump
3.	Testing and Maintenance of Emergency Equipment:		fre gear done on annual
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	Χ	rach employer assignmente from the function of the principles of t
	b. Is emergency equipment maintained in operable condition?	<u>X</u> _	good working order
4.	Has owner/operator provided immediate access to internal alarms (if needed)?	<u>X</u> _	
5.	Is there adequate aisle space for unobstructed movement?	<u>X</u> _	
Cor	tingency Plan and Emergency Procedure (Part 265, Subpart D)	or the second se	

١.	Does the	e cor	ntingency	plan
•	contain	the	following	g:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

no contingency plan

医脓肿病 自由 医自动电子多数形式

- b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?
- c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

Χ

X

X

X

Capal Single (pp.) 187 and also with 1994

	2.	Are copies of the Contingency Plan available at site and local	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
		emergency organizations?	<u> X</u> .	
	3.	Emergency Coordinator		
·	•	a. Is the facility emergency Coordinator identified? -	X	
		b. Is coordinator familiar with all aspects of site operation and emergency procedures?	X	i filografia (magaliwan na 1946) Magaliwa (magaliwa magaliwa m Magaliwa (magaliwa magaliwa m
	sarF	c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		
	4.	Emergency		
	,	If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procdures listed in §265.56?		A Maria Angles de la
	**		EPING AND REPORTING 52, Subpart D)	
(A)	E r	re Manifests, Annual Reports, xception Reports, and all test esults and analyses retained for t least three years?		
(B)	R	as the generator submitted Annual eports and Exception Reports as equired?		
			NATIONAL SHIPMENTS 62 Subpart E)	
(A)		as the installation imported or xported hazardous waste?	<u>X</u> _	

(If A was answered Yes, then complete the following as applicable.)

- 1. Exporting Hazardous waste, has a generator:
 - a. Notified the Administrator in writing?
 - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?
 - c. Met the Manifest requirements?
- 2. Importing Hazardous Waste, has the generator:

Met the manifest requirements?

VIII. Remarks

PEMARKS: Handschy Industries manufactures p	aint vehicles and finished flexographic inks.
The waste streams they generate are as foll	ows:
	process to outdoor in-ground concrete tank.
2) alkaline cleaners: D002 - is pumped from	om process to outdoor in-ground concrete tank
3) scrubber water: D002 - is pumped from	process to outdoor in-ground concrete tank.
The tank is open on the top. Waste is neut	ralized by mixture of the three waste streams
plus is open to rainwater. Treatment exemp	t from regulation as elementary neutralization -
725.101cl0. Generation of waste and tank a	re regulated. Tank holds approximately 10,000
gallons and is pumped out when approximatel	y 5 full, in 4000-5000 gallon increments, about
every 1-2 weeks. Total waste generated year	rly approximately 120,000-150,000 gallons
4) waste solvent: F003, D001 - 40,000-45,	000 gallons generated yearly - stored in 55 gal
drums - is pumped out by Mr. Franks into tar	nker truck and hauled to American Chemical in
indiana. At time of inspection, approximate	ely 50+ drums were on site, outdoors. Mr. Butler
stated that Mr. Franks had pumped out the di	rums yesterday. Many of these drums were open,
but many of these had remaining inside a sli	udge ink pigment filling about 1/3 the volume of
the drums. This studge will be diluted/mixe	ed with waste solvent and then be removed with
on them.	ere marked, labelled, nor had a date of accumulati
-Site was in non-compliance for the following lack of training documentation	
-no contingency plan	
weekly inspections of drums not done	
-drums not marked, labelled, no date of accum	
are of accum	intactoff
6	
*insert above: final pH=9	<u></u>
···	

D.L.P.C. COMPLAINT INVESTIGATION FORM

Copp	- C87-86N
Reverdale	1 Handochy ()
医乳腺 医乳腺 化二甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基	By LAC By Phone In Person By Mail
Complainant	Respondent Handschy
Address	Address 13700 Wood St.
Telephone	_Telephone
Directions to Source	
Complaint Details discharges	ng green solution ento letod It- to MSD
refused	to MSD
And the second of the second	
Date 12-9-83 Tim	******************** INVESTIGATION FINDINGS ne 10:45 am By B. Eleden
	Weather — Photos none
	The control of the co
ISS unpe	of any discharge ction ocheduled 12.15.83
	tion my MSD indicated
	ge was water & algae
Respondent's Remarks	
Pofor to	**************************************
Refer to No.	03/25803
File Opened - Yes No ce N.R.	Cook Co- 03/25803 Riverdale Handschy Leg. (2)
LPC 41 Rev. 11/81	3 Exhibit 4

WEBER and PERMUT, INC. THE INDEPENDENT INK EXPERTS

10 FIRST STREET HACKENSACK, N. J. 07601



TEL 201-342-9096

To : Ms. Mary Drake, U.S. EPA - Office of Regional Council

Subject: A Review of Documents from Handschy Industries

and Land and Lakes Co.

Date : January 22, 1987

A review of documents from the subject companies, submitted by the U. S. E. P. A., has been made. The purpose of the review is to determine the possibility of Lead and/or Chromium contamination entering the waste water collection system at the Handschy Industries facility in Riverdale, Illinois. The relevant documents which were studied include raw material lists, both current, and at 31 March 1981, Material Safety Data Sheets or all raw materials, and the records relating to the cleaning of the in-ground waste water pit. A report from Camp, Dresser and McKee, prepared by Versar, was also studied.

During the course of this review, several telephone conversations were held between the author and recipient of this report, concerning interim findings. The points raised in these conversations were communicated to Handschy, Inc., and their responses have been taken into consideration in the preparation of this report.

In reviewing the inventory listing supplied by Handschy, potential sources of the lead and chromium found in the wastes at the plant were identified. On page 5 of the 31 March 1981 inventory, 89 pounds of Litharge are listed. Litharge is Lead II Oxide (PbO). In the listing of materials currently used at the facility are a number of dyestuffs sold by BASF under the tradename Neozapon, which are Chromium complexes. Though Litharge is included in the current listing, none was in inventory and none was on order. The Neozapons were not found on the 31 March 1981 inventory, but neither were most of the pigments and other dyestuffs used in the plant. Also included with the documents is a list of materials used after November 1980, but since all materials are listed by Handschy's own internal code, it is not possible to determine which materials are included.

Potential sources of lead and chromium are established, but it is not possible to determine usage of these materials. Though the Litharge was found in March 1981, the pit and drains were cleaned in June 1982. There is currently no Lithargge in inventory, and no way to determine when it was last used.

Handschy claims that the Litharge is used only in oil inks, while the Neozapons are used only in solvent-based inks. This is very possible; however it does not exclude the possibility of these materials finding their way into the waste water system. Spills of ink and/or dry materials may easily be washed into the floor drains.

The CDM analysis mentions an "organic" layer samples in the waste-water pit. Low concentrations of hydrocarbons and 2 ethylhexylphthalate were found. These items, also, are used primarily in solvent-based inks, and should not have been found in the waste water pit.

Handschy also claims that the lead content in the floor drains and waste pit is due to the proximity of the plant to busy highways. Concentration of lead in soil samples in the vicinity of the plant are offered as further evidence. If this were the source of the lead, it would be expected that concentrations in the sludge from the drains and pit would be roughly equal to each other and that of the soil samples. This is not the case. There is wide fluctuation in concentration among the samples, and many are distinctly higher than that of the soil samples. They offer no explanation for the presence of the chromium.

In conclusion from the information submitted thus far, it is possible to identify potential sources of lead and chromium contamination of the floor drains and waste pit at the Handschy plant. It is not possible to say with certainty that these are the sources. More information on material usage, use patterns, and housekeeping practices before a more definite conclusion can be made.

Respectfully submitted,

Gerald Highberger

GH:ez

RESUME

Gerald Highberger

Non-Responsive

Linden, N.J. 07036 201-342-9096 - Business

Non-Responsive

Non-Responsive

Water and Parmet. J. 10 1 St. Packer of 1601

Education

- M.S. Chemistry (Polymer Science), 1973, Stevens Institute of Technology, Hoboken, N.J.
- B.S. Chemistry, magna cum laude, 1970, Stevens Institute of Technology, Hoboken, N.J.

Attendance at various industry related courses on ink and printing technology, TOSCA, RCRA, Air Pollution Compliance, and OSHA Hazard Communication Standard.

Professional

1984 to present

Weber and Permut, Inc., President - responsible for administration, sales and technical aspects of ink consulting business; technical work includes supervisory and direct role in the formulation, production, quality control and application of solvent-based and water-based flexographic and gravure inks, production start-ups, raw material evaluation and specification, and in-plant trouble shooting, giving on site seminars on ink technology and safety.

1983 to 1984

Weber and Permut, Inc., Vice President - same responsibilities as above.

1973 to 1984

Weber and Permut, Inc. - lab chemist and technical service, including ink formulation, raw material evaluation and specification, in-plant trouble shooting and technical service calls.

1970 to 1973

Howmet Corporation (Roll Leaf Division) - started as lab chemist after graduating from college and after $3\frac{1}{2}$ years had worked up to Manager of New Products, in charge of laboratory, mixing department, coating department and quality control for roll leaf (hot stamping foils) and office products division.

Community

Pollution Control Financing Authority of Union County - served for 6 years,

2 as Chairman

Linden Environmental Assessment Committee - served 1 year on this Ad Hoc Committee

Linden Environmental Commission - serving as Chairman of this newly formed Commission

SUMMARY OF QUALIFICATIONS

Gerald Highberger, M.S.

Mr. Highberger is President of Weber and Permut, Inc. Weber and Permut, Inc. is a printing ink consulting firm. He was awarded a Master of Science in Polymer Science by Stevens Institute of Technology in 1973.

Mr. Highberger is responsible for administration, sales and technical aspects of the ink consulting business. His technical work includes supervisory and direct role in the formulation, production, quality control and application of both solvent-based and water-based flexographic and gravure inks. Mr. Highberger also has experience in raw material evaluation and specification and in-plant trouble shooting.

Mr. Highberger has attended various industry-related courses on ink and printing technology, Toxic Substances Control Act (TSCA), Resource Conservation and Recovery Act (RCRA), Air Pollution Compliance and Occupational Safety and Health Administration (OSHA) Hazard Communication Standards. He has assisted companies with meeting clean Air Act and RCRA regulations as they relate to printing ink and operations. He has also trained ink-handling personnel in proper procedures for making ink press-ready and resolving common ink-related printing problems.

The attached curriculum vitae provides further details on Mr. Highberger's professional activities.

Diverdule / Hondschy Industries, In



October 22,1985

Mr. Don Gimble Illinois Environmental Protection Agency 1701 So. Frist Avenue Maywood, Illinois 60153

Dear Don,

You may recall several months ago, we met to discuss waste water generated by our company and shipped to Land and Lakes #2 Facility.

In one of our meetings we presented lab test from our waste water pit. It was then requested by the EPA to test the bottom of our waste water pit. Both tests show that we are well with in E.P. toxicity levels for non hazarous waste. We feel that with the lab test and letter from Sun Chemical Corporation it shows our waste to be non hazarous.

If we do not hear from the EPA in 2 to 5 days we will consider this adequate proof that our waste is non hazardous.

Sincerely,

HANDSCHY INDUSTRIES, INC.

David W. Dory

Plant Superintendent

RECEIVE JOSES Environmental Production Joses Environmental Production

10-25-85

::\!E ; 15: HANDSCHY INDUSTRIES, INC. FLUID INKS 13601 S. ASHLAND AVENUE RIVERDALE, ILLINOIS 60627 312/597-7990



Dispersions Division

3922 Bach-Buxton Road, Amelia, Ohio 45102 • (513) 753-9550 •1-800-543-1072

August 8, 1985

Mr. David Dory Handschy Industries, Inc. 13601 S. Ashland Avenue Riverdale, IL 60627

Dear Mr. Dory:

In response to your recent request, the Dispersions Division of Sun Chemical Corporation is pleased to submit the following information to Handschy Industries, Inc.

As we discussed over the telephone, we do not use lead or chrome as a component or carrier in any of our Flexiverse Dispersion products.

Should you require any further assistance, please do not hesitate to contact me.

Sincerely,

SUN CHEMICAL CORPORATION Dispersions Division

James M. Wenker

Environmental Chemist

JMW/dlt

cc: C. Campbell



GULF COAST LABORATORIES, INC. 2417 Bond St., Park Forest South, Illinois 60466 Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

METHOD OF STANDARD ADDITIONS

for

EXTRACTION PROCEDURE TOXICITY

EXTRACTION SAMPLE PREPARATION: Samples shall be prepared per an acceptable method as referenced below. Currently two methods are available for extraction, Method 1310, an approved method and Method 1330, a tentative method for oils and greases. Record all extraction data in the E.P. Toxicity series of lab books. Examples of pertinent extraction data are supplied upon the two enclosed keys. The extractor used is per Method 1310, figrues 2 and 3.

Test Methods for Evaluating Solid Waste, SW846 2nd Edition, Washington D.C., July 1982.

ADDITION SAMPLE PREPARATION AND ANALYSIS: All samples submitted for EP toxicity analysis are evaluated by the method of Standard Additions. Three (3) additions are necessary for each parameter for each sample. The resulting curve is subjected to a linear regression analysis which is subject to an internal laboratory quality control goal of obtaining a correlation coefficient (r) of 0.995 or greater. The r value of 0.995 corresponds to a 99% measure of the degree to which the two variables respond together. The resulting y-intercept represents the true value for each parameter accounting for any positive or negative interferences from the sample matrix.

Table 1 summarizes the method of analysis, instrumentation accessories used, wavelength conditions and sample addition levels utilized by Gulf Coast Laboratories. Instrumental operation for each parameter is per Gulf Coast Laboratories Standard Operational Procedures as updated January 8, 1985.

TABLE 1
EXTRACTION PROCEDURE TOXICITY
STANDARD ADDITION ANALYSIS METHOD

	Method of			Wavelength of	Addition
Parameter	Analysis	Instrument	Accessories	Analysis	Levels
Arsenic	GFAA	IL 635/357	IL 254	193.7	10, 15, 20 ppb
Bariu a	ICP	Il Plasma 180	Centronics 150-1	455,48	45, 1.0, 1.5 ppa
Cadaiua	AA Flame	P & E 370	Linear 255	228.8	0.5, 1.0, 1.5 pps
Chromium	AA Flame	P & E 370	Linear 255	357 .9	0.5, 1.0, 1.5 ppm
Copper	AA Flame	P & E 378	Linear 255	324.8	8.5, 1.8, 1.5 pps
Hercury	AA Cold Vapor	P & E 370	Linear 255	253.7	1, 2, 3 ppb
· · · · · · · · · · · · · · · · · · ·	'		P & E MAS	•	
Lead	AA Flame	P & E 370	Linear 255	283.3	85, 1.0, 1.5 ppm
Nickel	AA Flame	P & E 378	Linear 255	232.0	8.5, 1.8, 1.5 ppm
Selenium	BFAA	IL 635/337	IL 254	196.0	18, 15, 20 ppb
Zinc	AA Flame	P & E 370	Linear 255	213.9	0.5, 1.0, 1.5 pps
Silver	AA Flame	P & E 379	· Linear 255	328.1	0.5, 1.2, 1.5 pp≆



GULF COAST LABORATORIES, INC. 2417 Bond St., Park Forest South, Illinois 60466 Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Handschy Industries 13601 South Ashland

Riverdale, Illinois 60627

ATTN: Mr. Dave Dorey

DATE: 09/17/85

RE: Sludge from the Bottom

of the Pit

Sample Date: 08/28/85

GCL# 69669

GCL #	PARAMETERS	ANALYST	RESULTS	
67669	Alkalinity as Calcium Car	bonate 👶 an 🗀	B	mg/l
696 6 7	Ash at 550 C	rb	7.2	7.
69669	Cyanides, Reactive	lej	5.0	mg/kg
69669	Cyanides, Total	lej	8.4	mg/kg
69669	Flash Foint (Closed Cup)	ЬЬ	> 190	F
67669	pH	bs	7.2	
69669	Phenols	lej	₹ 5.0	mg/kg
69669	Reactive Sulfides	bs	< 5	mg/kg
69669	Solids, Total	rb	23.9	7
69669	Sulfides	рмс	6	mg/kg

	Page 1 of 2		
		•	· · · · · · · · · · · · · · · · · · ·
0.0 R. 1			20/05



GULF COAST LABORATORIES, INC.

2417 Bond St., Park Forest South, Illinois 60466
Phones (312) 534-5200 (219) 885-7077 (815) 723-7533

ANALYTICAL REPORT

TO: Handschy Industries

13601 South Ashland

Riverdale, Illinois 60627

ATTN: Mr. Dave Dorey

DATE: 09/17/85

RE: Sludge from the Bottom

of the Pit

Sample Date: 08/28/85

GCL# 69669

GCL # PARAMETERS	ANALYST	RE	SULTS		
69669 Arsenic EP Toxicity	ts ts		0.5	mg/1	
. 69669 Barium EP Toxicity	el	<	10	mg/l	
69669 Cadmium EP Toxicity	jh	<	0.1	mg/l	
69669 Chromium EP Toxicity	jh	<	0.5	mg/l	
67669 Copper EP Toxicity	jh	. <	Ø . 5	mg/l	
69669 Lead EP Toxicity	jh	<	0.5	mg/l	
69669 Mercury EP Toxicity	cmh		Ø.Ø2	mg/l	
69669 Nickel EP Toxicity	jh	<	0. 5	mg/l	
67667 Selenium EP Toxicity	ts	< 1	0.1	mg/l	
69669 Silver EP Toxicity	jh	<	0.5	mg/l	
69669 Zinc EP Toxicity	ήĹ		2.6	mg/l	
				44	

Page 2 of 2

pproved: John Boudreau	Analyst	Date 09/18/85



Environmental Protection Agency 1701 First Avenue, Maywood, IL. 60153

312/345-9780

Refer to: 0312580003 - Cook County - Riverdale/Handschy Industries, Inc.

CERTIFIED MAIL Return Receipt #P 060 650 270

October 29, 1985

Handschy Industries, Inc. 13601 S. Ashland Avenue Riverdale, Illinois 60627

Attn: D. Dory

Dear Mr. Dory:

The Agency has received your October 22, 1985 letter concerning the sludge in your "waste water pit". The information provided in this letter is not adequate to show your waste is not hazardous.

As per your phone conversation with Cliff Gould of this office, you must sample and test in accordance with the procedures in USEPA Publication SW846, "Test Methods for Evaluating Solid Waste", Second Edition.

Your submission to the Agency should include your sampling plan, and a description of your sampling procedures as well as the test results.

If you have any questions, please contact Cliff Gould at the above number.

Sincerely,

Transcent P. Busy

Kenneth P. Bechely, Northern Region Manager Field Operations Section Division of Land Pollution Control

KPB:CG:vc

cc: Division File

Northern Region



Environmental Protection Agency 2200 Churchill Road, Springfield, Illinois 62706

217/782-5544

Refer to: 0312580003-Cook County-Riverdale/Handschy Industries, Inc.

ENFORCEMENT NOTICE LETTER

Certified Mail Return Receipt # 594 555 362

April 22, 1986

Handschy Industries, Inc. 13601 S. Ashland Avenue Riverdale, Illinois 60627 Attn: D. Dory

Dear Mr. Dory:

The Agency has previously informed Handschy Industries, Inc. of apparent noncompliance with the requirements of the Environmental Protection Act and 35 Ill. Adm. Code 725.111.

Please be advised that a decision has been made to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency intends to refer this matter to the U.S. Environmental Protection Agency for the filing of a formal order.

Please contact Donald L. Gimbel of the Agency's legal staff at 312/345-9780 should you have any questions regarding this matter.

Sincerely,

Robert G. Kuykendall

R6 Kuyhinder

Manager

Division of Land Pollution Control

RK/DG/kes/0278K

cc: Division File Northern Region Donald L. Gimbel

LIST OF EXHIBITS

- Part A Application filed by Handschy Industries, Inc. with USEPA, date stamped November 19, 1980.
- EPA Supplemental Permit No. 821401 issued to Land & Lakes Company.
- Computer printout of manifest search for shipments of waste permitted by Supplemental Permit No. 84401.
- 4. DLPC Complaint Investigation Form for complaint received December 3, 1983.
- 5. RCRA Inspection Report for Inspection of December 15, 1983.
- 6. Correspondence dated March 15, 1984 from IEPA to Handschy Industries, Inc.
- 7. Correspondence dated March 27, 1984 from Handschy Industries, Inc. to IEPA, with enclosure.
- 8. Correspondence dated August 20, 1984 from IEPA to Handschy Industries, Inc.
- 9. Correspondence dated September 4, 1984 from Handschy Industries, Inc. to IEPA, with enclosure.
- 10. IEPA Generator Annual Hazardous Waste Report dated August 31, 1984.
- 11. Follow-up RCRA Inspection Report for inspection of October 23, 1984.
- 12. Correspondence dated November 21, 1984 from IEPA to Handschy Industries, Inc.
- 13. Handwritten Compliance Conference notes of December 4, 1984 conference.
- 14. Follow-up RCRA Inspection Report for inspection of April 3, 1985.
- 15. IEPA Memorandum dated April 11, 1985.
- 16. Correspondence dated April 17, 1985 from IEPA to Handschy Industries, Inc. and Land & Lakes Company.
- 17. IEPA telephone conversation record dated April 23, 1985.
- 18. IEPA telephone conversation record dated May 15, 1985.

Exhibits/2

- 19. IEPA Memorandum dated June 6, 1985.
- 20. Correspondence dated October 22, 1985 from Handschy Industries, Inc. to IEPA, with enclosure.
- 21. Correspondence dated October 29, 1985 from IEPA to Handschy Industries, Inc. and Land & Lakes Company.
- 22. Correspondence dated January 28, 1986 from Handschy Industries, Inc. to IEPA.
- 23. IEPA Memorandum dated February 7, 1986.
- 24. Correspondence dated February 24, 1986 from Handschy Industries, Inc. to IEPA, with enclosure.
- 25. Correspondence dated April 22, 1986 from IEPA to Handschy Industries, Inc.

ATTACHMENT

Handschy Industries, Inc. is a Delaware corporation, qualified to do business in Illinois, that has a manufacturing plant located at 1360l South Ashland Avenue, Riverdale, Illinois 60627. The president is listed by the Illinois Secretary of State as Don McMahon, 2525 North Elston, Chicago, Illinois 60647 and its registered agent is CT Corporation System, 208 South LaSalle Street, Chicago, Illinois 60604.

Handschy Industries, Inc. manufactures paint vehicles and finished flexographic inks at the Riverdale facility. regulated both as a generator and storer of hazardous waste. A description of the plant operation is contained in Exhibits 1, 5, 10 and 14. This referral concerns the failure by Handschy to comply with a generator requirement to determine if a solid waste is hazardous for one of its waste streams. The solid waste in question has been described by Handschy as "Pigment water, solvent, non-hazardous bulk liquid - F003" (see Exhibits 2, 15) and has been shipped to the Land and Lakes Company Landfill Numbers 1, 2 and 3 in Chicago, Illinois (see Exhibit 3, a computer printout of Illinois manifest information regarding these shipments). Handschy was requested by the Agency to make a determination whether the waste was hazardous waste as required by 35 Ill. Adm. Code 722.111 (Exhibit 16). Handschy has taken some tests to attempt to demonstrate the waste is not hazardous by characteristic of EP Toxicity, but has not yet shown it has used the test methods referred to in Section 721.124(a) (see Exhibits 18, 20 to 24).

Attachment/2

Thus, Handschy remains out of compliance with 35 Ill. Adm. Code 722.111. If the company does make the necessary determination, and the solid waste is shown to be hazardous, the company has failed to comply with the other regulations applicable to generators of hazardous waste for this waste stream.